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Final Environmental Impact Statement, City of Couer D'Alene, Idaho, Wastewater Facilities Plan

(U.S.) Environmental Protection Agency
Seattle, WA

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Region 10
1200 6th Ave.
Seattle, WA 98101

January, 1982

Water

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EPA

Environmental Impact Statement

Final

Wastewater Treatment Facilities for the City of Coeur d'Alene, Idaho

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16. ABSTRACT

Upgrade of the existing treatment plant at Coeur d'Alene is the alternative recommended by the Environmental Protection Agency in this final EIS as the most cost effective, environmentally accepted alternative.

Also discussed is future development on Blackwell Island and protection of the wetlands on the island. The EPA will require the city to take action to insure that no wetlands will be impacted in violoation of federal protection policies.

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U.S. ENVIRONMENTAL PROTECTION AGENCY

REGION X

1200 SIXTH AVENUE

SEATTLE, WASHINGTON 98101

February 12, 1982

REPLY TO ATTN OF: M/S 443

TO: All Interested Agencies, Public Groups and Citizens

Enclosed for your review and comment is the Final Environmental Impact Statement (EIS) for wastewater treatment facilities for the City of Coeur d'Alene, Idaho.

This EIS was prepared in compliance with the National Environmental Policy Act and implementing Agency regulations (40 CFR Part 6, November 6, 1979). Availability of the EIS will be announced in the Federal Register on February 12, 1982, beginning a 30-day comment period which will close on March 15, 1982. This agency will take no administrative action on this project until the close of the comment period.

We will appreciate your review of this document and any comments you may have. Please send all comments to Norma Young, M/S 443 at the above address.

FINAL
ENVIRONMENTAL IMPACT STATEMENT

CITY OF COEUR D'ALENE, IDAHO
WASTEWATER FACILITIES PLAN
EPA PROJECT NO. C-16-0300

Prepared By:

U. S. Environmental Protection Agency
Region 10
Seattle, Washington 98101

With Technical Assistance From:

Jones & Stokes Associates, Inc.
2321 P Street
Sacramento, California 95816

Responsible Official:

for L Edwin Coate, Acting
John R. Spencer
Regional Administrator

January 12, 1982
Date

PREFACE

On January 16, 1981, the U. S. Environmental Protection Agency (EPA) released for public review and comment a Draft Environmental Impact Statement (EIS) which evaluated the environmental impacts of construction of the proposed improvements to the Coeur d'Alene sewage treatment system. EPA has prepared this Final EIS to respond to the comments received and to present EPA's recommended action on the City of Coeur d'Alene's application for further grant assistance on the project.

Improvements to the City's wastewater treatment system are needed to upgrade effluent quality and expand service to City residents and to residents of adjacent urbanizing unincorporated areas. The wastewater facilities plan for the upgrade of the system was prepared by Brown and Caldwell, with the assistance of Meckel Engineering and Surveying. The Draft EIS was prepared concurrently with the City's Facilities Plan in order to avoid unnecessary delay.

The Draft EIS evaluated four alternatives, the "no action" alternative and three "build" alternatives. Early planning involved the screening of a large number of alternatives. Among the alternatives considered was a regionalization alternative for joint treatment with the City of Post Falls. EPA requested that this alternative be investigated because of the proximity of the two cities on the Spokane River and the timing of the planning efforts. Extremely high interceptor costs were predicted, however, and the joint treatment alternative was eliminated. With the aid of a local Citizens Advisory Committee, three action alternatives were selected for detailed evaluation. The "no action" alternative served as a baseline for comparison but was not acceptable because the sewage treatment plant would continue to suffer occasional hydraulic overloads and violations of the City's National Pollutant Discharge Elimination System permit (NPDES) suspended solids limits. The three remaining action alternatives evaluated were: upgrade of the existing treatment plant (Alternative B); construction of a new plant at a site downstream from the existing plant (Alternative E); and upgrade of the existing plant (without expansion) and construction of a second treatment facility 1-2 miles north of the City (Alternative G).

The preferred alternative identified by the City and the Citizens Advisory Committee was Alternative E, construction of a new plant on a new downstream site. This selection was reported in the Draft EIS. Although EPA agrees that Alternative E would provide a number of beneficial impacts, it would cost

$3 million more to construct and operate a new plant than to upgrade the existing facility. Rehabilitation of equipment at the present plant and expansion of plant capacity will greatly improve effluent quality and will reduce potential contamination of the Rathdrum Prairie aquifer. In addition, Alternative B is environmentally acceptable and the most cost-effective alternative. EPA does not consider that the benefits of building a new plant are sufficient to warrant expenditure of an additional $3 million to solve existing problems. EPA, therefore, recommends implementation of Alternative B and has so indicated to the City. With the prospect of a reduced amount of available federal grant funds, the City and Citizens Advisory Committee have agreed that upgrade of the existing plant is acceptable, and the City has applied for funds to design and build a new clarifier on the existing site.

As discussed in the Draft EIS, the wastewater facilities plan indicates that future development is planned on Blackwell Island. Growth is also projected in the general vicinity of Nettleton Gulch. Both of these areas lie in a designated floodplain, and 15 acres of wetland are located on Blackwell Island. The wastewater facilities plan includes capacity that could be utilized for developments on the Island. While EPA will not participate in financing the interceptor connection to Blackwell Island, the award of funds would provide treatment plant capacity for this development.

EPA regulations implementing Section 201 of the Clean Water Act restrict federal grants where capacity would be utilized for development of environmentally sensitive lands. Inasmuch as sewage treatment capacity for eventual extension of sewage service to Blackwell Island is included in the proposed interceptor system, EPA will require the City to take action as necessary to assure that no wetlands or floodplains will be impacted in violation of federal protection policies as a result of expanding the City's wastewater treatment capacity. This can be accomplished by assessing the extent of the environmentally sensitive areas on Blackwell Island and by requiring environmental assessments for any proposed developments that would adversely affect these areas. EPA grant awards for design and construction of the wastewater facilities will require the City's assurance that these areas will be afforded proper consideration and/or protection. The City, in fulfilling this requirement, should coordinate its activities with the U. S. Corps of Engineers, U. S. Fish and Wildlife, the Idaho Department of Fish and Game, the Department of Health and Welfare and EPA.

A final decision on the award of a Clean Water Act Section 201 construction grant to the City of Coeur d'Alene for design and construction of the selected alternative will not be made by the EPA Regional Administrator until the close of the 30-day comment period on this Final EIS.

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* APPENDIX A - NOT PRINTED.

EXECUTIVE SUMMARY

( ) Draft Environmental Impact Statement
(x) Final Environmental Impact Statement
Type of Action: Administrative

Project Need

The City of Coeur d'Alene, Idaho wastewater treatment system provides secondary treatment and discharge to the Spokane River. The treatment plant is currently judged to be at its effective capacity. Occasional hydraulic overloading and the deteriorated condition of some of the treatment units have led to violations of the City's National Pollutant Discharge Elimination System (NPDES)* permit effluent limitations. This in turn has resulted in issuance of an EPA compliance order and has stimulated the Coeur d'Alene City Council to place a temporary moratorium on new sewer hookups, pending improvements in the wastewater facilities. In addition, proposed new discharge requirements for Coeur d'Alene specify an improved level of treatment to reduce discharge of pollutants to the Spokane River.

Project Funding

In order to improve its wastewater treatment capabilities, Coeur d'Alene contracted with Brown and Caldwell of Seattle and Meckel Engineering and Surveying of Coeur d'Alene to prepare a Step I wastewater facilities plan. The EPA administers grant funds for such planning efforts under Section 201 of the Federal Clean Water Act. The planning, design and construction of facilities improvements can receive up to 75 percent federal and 15 percent state funding.

EPA issued a Step I planning grant of $158,088 to Coeur d'Alene in May 1979. Before additional funds for design and construction of a selected project can be awarded, EPA is required to complete an environmental review of potential impacts of the project. This review must meet the requirements of the National Environmental Policy Act (NEPA). In addition, the Safe Drinking Water Act requires that federal agencies ensure that any action taken does not lead directly or indirectly to contamination that would create a significant health hazard in a "sole source aquifer".

To comply with these requirements, EPA has prepared a Draft and this Final EIS to evaluate the consequences of the

* A list of acronyms and abbreviations is included on Page 85.

construction of Coeur d'Alene's proposed long-term wastewater treatment solution. Prior to issuing this Final EIS, EPA issued a Finding of No Significant Impact (FNSI) for Coeur d'Alene's proposed interim facilities improvements. Issuance of the FNSI has allowed Coeur d'Alene to apply for fiscal year 1981 grant funds prior to completion of this Final EIS on the 20-year facility plan.

The State of Idaho priority list for financial assistance included $830,000 in fiscal year 1981 for Coeur d'Alene interim project design and construction (Steps II and III). It is estimated that an additional $2,625,000 in federal and $525,000 in state funds will be sought by the City to complete the first stage of its wastewater facilities project. The availability of these funds is unknown, as fiscal year 1982 grant funds have not yet been determined. The local share of Stage 1 funding is expected to be approximately $456,000 (expressed in 1981 dollars [Brown and Caldwell 1981]).

Alternative Selected by the City of Coeur d'Alene

Coeur d'Alene has selected Alternative B1 as its preferred option. This includes a staged upgrading and expanding of wastewater facilities at the existing treatment plant site adjacent to the Spokane River. It is a modification of the Alternative B described in the Draft EIS. Rather than expanding the plant to the east, across the Burlington Northern railway tracks, all new facilities would be constructed on the existing City wastewater treatment plant property. This revised Alternative B was developed subsequent to issuance of the Draft EIS, in response to reduced levels of federal and state funding and less stringent effluent quality requirements.

The proposed project has been divided into two stages. The first would enlarge and upgrade the facility to a 4.2 million gallons per day (mgd) capacity. The second stage would expand the plant to a 6.0 mgd capacity. Because of funding limitations, the first stage has now been broken into two phases. The first phase, entitled "Interim Improvements", will increase plant capacity to 3.0 mgd.

Interim Improvements - Phase 1 of Stage 1

The issuance of a FNSI by EPA will allow Coeur d'Alene to use $830,000 in fiscal year 1981 grant funds to increase its wastewater clarifier capacity. This segment of the treatment system is currently at capacity. The interim improvements will include construction of a secondary sedimentation tank immediately north of the existing trickling filter at the

Coeur d'Alene plant site. New on-site piping will be added to connect the clarifier with the outfall. If sufficient funds are available, the plant's chlorination equipment will also be improved. The clarifier capacity is needed to consistently meet NPDES waste discharge limitations and allow a lifting of the sewer system hookup ban. Plant capacity will be increased to 3.0 mgd.

All wastewater will continue to receive biological secondary treatment and will be discharged to the Spokane River through the existing outfall. Sludge will be disposed of at the presently used location.

Phase 2 of Stage 1

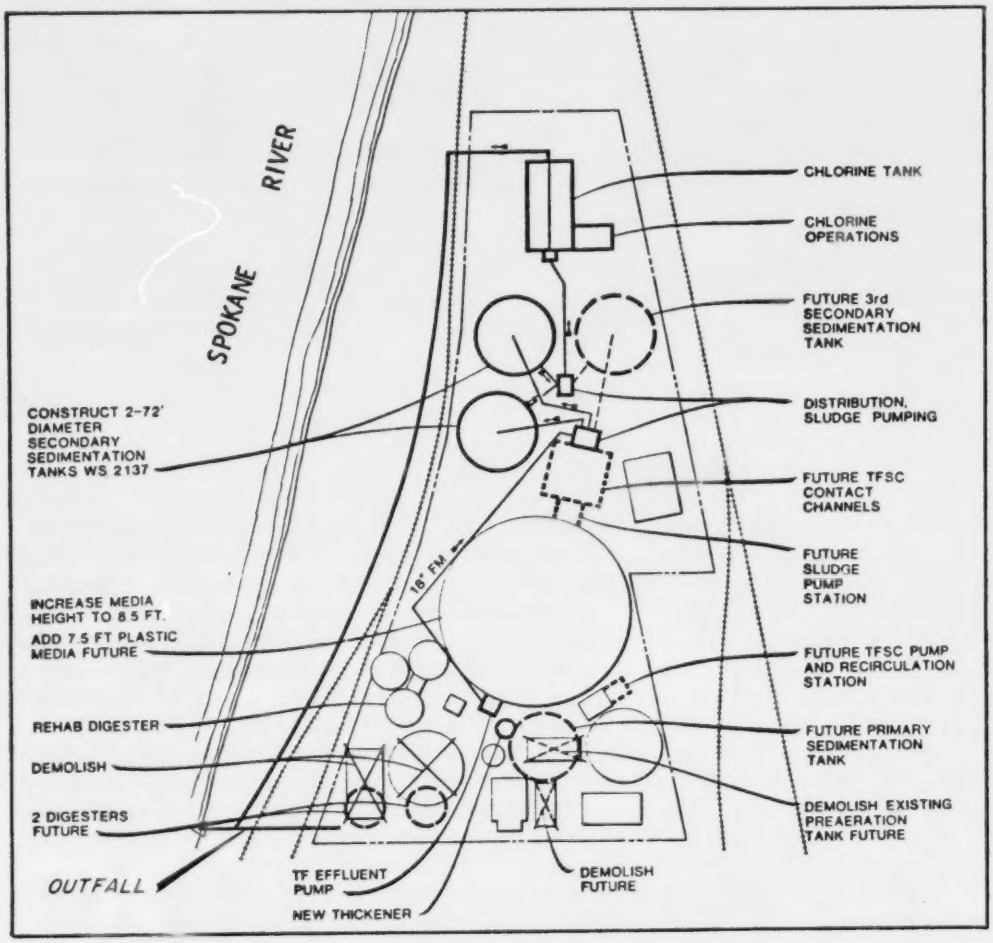
In the second phase of Stage 1, treatment capacity will be expanded to 4.2 mgd. This is expected to provide sufficient capacity through 1992. Additional secondary sedimentation capacity will be added and a variety of other on-site modifications are planned. Dechlorination and phosphorus removal capabilities will be added on the existing plant site. When the NPDES permit is rewritten for Coeur d'Alene it is anticipated that eighty-five percent phosphorus removal will be required on a seasonal basis (April 1 to October 31). Dechlorination will occur year round. The existing trickling filter will be improved by adding additional rock media; this will increase waste oxidation capabilities without requiring additional space. Figure 1 diagrams the preliminary site layout of Alternative B1 and Table 1 includes the preliminary design criteria.

The timing of second phase construction is unknown at present, but if federal and state grant funds are made available, design could start in 1982. Total Stage 1 costs are estimated at $4,090,000 (Brown and Caldwell 1981).

Stage 2

In Stage 2, clarification capacity will again be increased by adding a third secondary sedimentation tank. The trickling filter will be increased in height and converted to a synthetic media filter tower to keep the plant's space requirements to a minimum. Chlorination and sludge digestion capabilities will also be increased in Stage 2 (See Table 1). No change in sludge or wastewater disposal mode is expected.

After all Stage 2 modifications are complete, the Coeur d'Alene plant will have a 6.0 mgd capacity. This is expected to provide service to the City through the year 2002. The Stage 2 cost is estimated at $6,129,000; the total project cost is $10,689,000 (Brown and Caldwell 1981).



SOURCE: BROWN & CALDWELL, 1981

FIGURE 1. ALTERNATIVE B-1 -- SITE LAYOUT

Table 1. Recommended Plan--Preliminary Design Criteria

Design basis	First stage	Second stage
INFLUENT		
Flow, mgd	4.2	6.0
BOD, mg/l	215	215
SS, mg/l	215	215
MECHANICALLY CLEANED BAR SCREEN	1	1
Velocity, ft/sec	1.8	1.8
GRIT REMOVAL TANKS	1	1
Detention time, min	20	20
Grit pumps	1	1
PRIMARY SEDIMENTATION TANKS	1	1
Overflow rate, gal/ft^2/day ADWF	950	780
TRICKLING FILTER RECIRCULATION PUMPS		
Number	2	2
TRICKLING FILTER CARBONACEOUS OXIDATION		
Number	1	1
BOD/1,000 ft^3	35	20
Diameter, ft	165	165
Depth (ft)/media	7/rock	18/synthetic
SOLIDS CONTACT CHAMBER		
Number	1	1
Detention time, min	10	10
SECONDARY CLARIFIERS		
Number	3	4
Overflow rate, gal/ft^2/day	550	550
CHLORINE CONTACT		
Number	3	4
Detention time, hr	1	1
ANAEROBIC DIGESTERS (Alum sludge included)		
Number	3	5
Loading, lb VSS/1,000 ft^2/day	0.04	0.04
Hydraulic detention time, days	33	30
BELT FILTER PRESS		
Number	1	1
Feed rate, gpm at 3 percent solids	125	125

Source: Brown and Caldwell 1981

Sewer System Extensions

The sewer system improvements and extensions described in the facilities plan are to be implemented independently of wastewater treatment facility improvements. Brown and Caldwell has divided the work into two groups: near-term projects and long-term projects. The near-term projects seek to connect existing urbanized areas relying on septic tanks; this includes the high school and the county fairgrounds. The long-term projects will be constructed as local growth patterns require. No specifc construction time frame has been developed; Brown and Caldwell (1981) suggests that a schedule for the near-term projects be developed by the Panhandle Health District.

The near-term collection system improvements are estimated to cost $1,916,000; the long-term projects will cost a total of $3,263,000 (Brown and Caldwell 1981). These improvements will be financed through formation of local utility improvement districts. The amount of federal and state grant support available for interceptor construction is unknown.

Rationale for Selection of Alternative B1

Chapter 10 of the wastewater facilities plan (Brown and Caldwell 1981) presents an evaluation of the three primary alternatives considered by the City of Coeur d'Alene. Cost criteria, performance criteria and environmental criteria are discussed in this alternatives evaluation. Alternative B is described as the least costly and least energy intensive of the three options. Its total present worth cost is approximately $3 million lower than Alternative E (relocation of the plant downstream) and $4.3 million lower than Alternative G (seasonal land disposal north of Coeur d'Alene).

Of the two Alternative B sub-options identified in the facilities plan, Alternative B2 has a lower capital cost - $8.8 million compared to the $10.2 million of Alternative B1. In terms of operation and maintenance costs, however, B1 is lower than B2 - $245,000 annually for secondary treatment compared to $325,000 annually (Brown and Caldwell 1981).

The remainder of the alternatives evaluation showed Alternative B1 with favorable ratings for reliability, and protection of surface and groundwater, sensitive areas, terrestrial habitat, and recreational use. It did not rank as high in terms of reclamation potential, cultural resource and air quality protection, and aesthetics.

In the final facilities plan evaluation, Alternative E was identified as the environmentally preferable alternative because it would remove the treatment plant from an urbanizing area and provide room for future expansion. Due to funding limitations, however, Alternative B1 was selected as the preferred alternative due to its low cost and its ability to be staged. The environmental benefits of E were not considered sufficient to warrant the extra cost.

Environmental Impacts of the Selected Alternative

Impacts to the Spokane River

Construction of wastewater facilities improvements under Alternative B1 will eliminate the occasional discharge of wastewater that fails to meet the effluent limits of Coeur d'Alene's NPDES permit. This will be accomplished by increasing the amount of trickling filter media and the amount of clarifier capacity at the plant. As flows through the plant increase from about 2 mgd to 6 mgd, however, the added biochemical oxygen demand (BOD) and ammonia loads entering the river could aggravate the low dissolved oxygen (DO) conditions that exist in summer months just upstream from Post Falls Dam. This may eventually lead to added treatment requirements, but this is unknown at present. The gradual increase in waste nutrients added to the river (nitrogen and phosphorus) may also stimulate an increase in algal production below the Coeur d'Alene outfall.

Heavy metals and other toxins present in small concentrations in the wastewater will be discharged in increasing amounts as flows through the plant increase. These constituents may affect egg and larval stages of fish downstream from the outfall. Existing levels of zinc and copper in the Spokane River already exceed EPA recommended criteria for protection of freshwater biota, but impacts on the local fishery are undocumented.

Persons drawing domestic water supplies from the Spokane River downstream from the Coeur d'Alene outfall will face an increasing health risk from the increasing waste discharges. There are an estimated 164 residences being supplied drinking water from the river in a 12-mile stretch below the Coeur d'Alene outfall. The NPDES permit disinfection requirements and monitoring of effluent quality will help to reduce the risk of contaminating the domestic water supplies.

Impacts to the Rathdrum Prairie Aquifer

The construction of added wastewater treatment capacity will allow Coeur d'Alene to gradually hook up septic tanks that are now contributing to Rathdrum Prairie Aquifer contaminations. Over the 20-year planning period, 5,000 existing residents are expected to be converted from septic tank use to collection system hookups. This is a major benefit of the wastewater facilities proposal, as the Rathdrum Prairie Aquifer has been designated a "sole source" aquifer under the Federal Safe Drinking Water Act.

The increasing waste flows accommodated by Alternative B1 will in turn generate greater volumes of sewage sludge. A 300 percent increase is anticipated by 1995. This sludge will be mechanically dewatered at the plant site and trucked to the existing disposal site at the Coeur d'Alene landfill. This disposal site is over the aquifer and therefore poses a long-term threat to groundwater quality and public health. Migration of leachate from the sludge disposal site is possible due to the coarse nature of the substrate in the vicinity of the landfill. Sludge leachate characteristically contains high levels of nitrates and also may contain significant amounts of heavy metals.

Land Use Conflicts

Expansion of wastewater facilities at the existing treatment plant site will aggravate existing land use conflicts between the treatment facilities and adjacent residential and institutional uses. Odor and aesthetic complaints are occasionally voiced by North Idaho College and residents to the southeast of the plant. The college would like to expand to the north, closer to the plant, and condominium and commercial development is planned for vacant land north and east of the plant. Therefore, odor and aesthetic complaints are likely to increase as the treatment facilities expand and urbanization of surrounding land continues.

Impacts on Archeological Resources

The land adjacent to the Spokane River in the vicinity of the proposed treatment plant expansion was once the site of a major Coeur d'Alene Indian village. While the exact boundaries of the settlement are not known, the general area has been designated Site 10-KA-48 in state archeological site survey records. An analysis of the Alternative B1 expansion site conducted by the University of Idaho Laboratory of Anthropology, however, concluded that no significant cultural materials would be affected by plant construction. (See relevant correspondence in Appendix B.)

Cost

Alternative B was the lowest cost alternative (other than "no action") analyzed in the Coeur d'Alene facilities plan. The revised final analysis of Alternative B1, contained in Chapter 10 of the facilities plan (Brown and Caldwell 1981), lists the present worth of the project as $12,200,000. This does not include construction of interceptor extensions. The initial phase of construction is expected to cost $1,060,000 with $830,000 coming from federal grant funds. The entire first stage of the project, expanding the plant to 4.2 mgd, will cost $4,560,000 with $456,000 coming from local funds (costs listed in 1981 dollars). This assumes 75 percent federal and 15 percent state grant support will be available for most elements of the first stage (Brown and Caldwell 1981). These costs are slightly higher than would be the case if Stage 1 could be constructed in a single phase. Construction mobilization and start-up inefficiencies make a two-phase Stage 1 more costly.

User fees within the Coeur d'Alene wastewater service area are expected to increase from approximately $4.50 per month to $6.50 per month to finance the first stage (4.2 mgd facility) of the project (Brown and Caldwell 1981).

Financing of interceptor extensions under Alternative B1 will probably come primarily from local funds. While EPA rules allow for funding of some interceptors, they are currently of a lower priority than treatment facilities. The present shortage of grant funds makes the EPA financing of interceptors unlikely in the near future. Near-term interceptor construction is estimated to cost $1,900,000. The long-term interceptor projects will cost another $3,200,000 (Brown and Caldwell 1981). These improvements will probably be financed through formation of local utility improvement districts. Persons served by the interceptors will therefore pay for the service.

Major Growth Implications

The additional wastewater capacity at the Coeur d'Alene treatment plant will indirectly support the development of an estimated 2,300 urban acres in the Coeur d'Alene area by the year 2005. If development proceeds as currently indicated by the Coeur d'Alene general plan, this will include 440 acres of prime agricultural land. It is also expected to serve development of Blackwell Island; this lowland area across the river from the treatment plant is within the designated 100-year floodplain of the Spokane River and contains natural wetland areas. It is also part of archeological Site 10-KA-48, which may be eligible for inclusion on the National Register of Historic Places.

The addition of 2,300 urban acres in the Coeur d'Alene area will increase the amount of urban runoff percolating into the surface over the Rathdrum Prairie Aquifer. This has the potential for affecting the quality of drinking water supplies extracted from the aquifer in the area.

Impact Mitigation Measures

Many of the impacts listed above will be reduced in severity or eliminated if planned mitigation measures are implemented. The surface water quality impacts associated with increasing volumes of wastewater discharged to the river will be reduced by the addition of phosphorus removal processes in the second phase of project construction. In addition, water quality monitoring requirements of Coeur d'Alene's NPDES permit will reduce the chance of undetected contamination of downstream water supplies due to inadequate wastewater treatment.

Mechanical dewatering of sludge at the treatment plant site will reduce the chances that leachate from the sludge drying beds near the Coeur d'Alene landfill will adversely affect aquifer water quality. EPA recommends that a regular groundwater quality monitoring program be established at the sludge disposal site if it continues as the principal sludge drying area for Coeur d'Alene.

Land use conflicts at the treatment plant site have been reduced somewhat by modifying Alternative B so that only city-owned property is needed for facilities expansion. This will avoid direct competition for space between different land use proposals. Aesthetics complaints could be reduced by planting a vegetative buffer between the plant and adjacent properties.

Project cost impacts have been minimized by selecting the least costly alternative.

EPA's Recommended Action

EPA concurs with the City of Coeur d'Alene that Alternative B1 is the preferred wastewater management plan. It is the most cost-effective alternative and is environmentally acceptable. EPA does not consider that the benefits of building a new treatment plant (Alternative E) are sufficient to warrant expenditure of an additional $3 million to solve existing water quality problems.

In order to facilitate the earliest possible remedying of discharge permit violations, EPA has issued a Finding of No Significant Impact (FNSI) for the proposed interim project improvements. This has allowed EPA and the State of Idaho to award $830,000 in assigned grant funds to Coeur d'Alene to begin treatment plant improvements. Before additional grant awards for design and construction of facilities can proceed, however, review of this Final EIS must be completed and a Record of Decision must be issued. In addition, further action on grant requests are contingent on the City's efforts to assure that extension of a wastewater interceptor to Blackwell Island (proposed in the facilities plan) will be assessed and that the City will take action to assure that no wetlands or floodplains will be impacted in violations of federal protection policies as a result of this interceptor extension.

Coordination

Since initiation of this EIS in June 1979, there has been an EIS scoping meeting (June 4, 1979 in Coeur d'Alene) and numerous meetings of the facilities plan Citizens Advisory Committee, which EPA regularly attended. In addition, there has been frequent EPA contact with local and state agencies and private citizens. These efforts sought to identify environmental issues related to the wastewater facilities plan and to collect background environmental data for use in preparation of the EIS.

The Draft EIS was distributed for public review on January 16, 1981. A public hearing was held on the draft document on February 18, 1981 in Coeur d'Alene, and the official comment period extended to March 15, 1981. All written and oral comments received on the Draft EIS have been responded to in this Final EIS. Persons wishing to comment on the Final EIS should submit their material to Ms. Norma Young, M/S 443, U. S. Environmental Protection Agency, Region 10, 1200 Sixth Avenue

Seattle, Washington, 98101 no later than March 15, 1982. All comments received prior to that date will be considered by EPA before action is taken on Clean Water Section 201 requests from the City of Coeur d'Alene. After close of the comment period, the EPA Regional Administrator will make a final decision on funding of the proposed project in a Record of Decision. A list of persons receiving the Draft EIS is included at the back of this Final EIS.

Chapter 1

LETTERS OF COMMENT ON THE DRAFT EIS AND EPA RESPONSES

Introduction

The Coeur d'Alene facilities plan Draft EIS was available for public review from January 16, 1981 to March 2, 1981. During this period, EPA, Region 10 in Seattle, Washington received nine letters of comment on the document (see listing below). The letters are presented on the following pages. Each comment that has been marked and numbered in the left hand margin has received a response, which can be found immediately following the comment letter.

Table 2. Agencies Submitting Written Comments on the Draft EIS

Federal Agencies

Advisory Council on Historic Preservation

U. S. Department of Agriculture, Soil Conservation Service-Boise Office

U. S. Department of the Army, Corps of Engineers-Seattle District Office

U. S. Department of Housing and Urban Development-Seattle Office

U. S. Department of Housing and Urban Development-Portland Office

U. S. Department of the Interior, Office of the Secretary-Pacific Northwest Region

State Agencies

Idaho Department of Fish and Game-Region 1

Idaho Department of Health and Welfare, Division of Environment-Boise Office

Idaho Division of Economic and Community Affairs-Boise Office

Advisory Council On Historic Preservation

1522 K Street, NW
Washington, DC 20005

Reply to:

Lake Plaza South, Suite 616
44 Union Boulevard
Lakewood, CO 80228

January 26, 1981

Ms. Norma Young M/S 443
Environmental Evaluation Branch
U.S. Environmental Protection Agency
1200 Sixth Avenue
Seattle, Washington 98101

Dear Ms. Young:

The Council has reviewed your draft environmental impact statement for Wastewater Treatment Facilities for the City of Coeur d'Alene, Idaho, circulated for comment pursuant to Section 102(2)(c) of the National Environmental Policy Act. We note that the undertaking may affect archeological properties which the Idaho State Historic Preservation Officer deems eligible for inclusion in the National Register of Historic Places. Circulation of a draft environmental impact statement, however, does not fulfill your agency's responsibilities under Section 106 of the National Historic Preservation Act of 1966 (16 U.S.C. Sec. 470f, as amended, 90 Stat. 1320).

Prior to the approval of the expenditure of any Federal funds or prior to the granting of any license, permit, or other approval for an undertaking, Federal agencies must afford the Council an opportunity to comment on the effect of the undertaking on properties included in or eligible for inclusion in the National Register of Historic Places in accordance with the Council's regulations, "Protection of Historic and Cultural Properties" (36 CFR Part 800). Until these requirements are met, the Council considers the draft environmental statement incomplete in its treatment of historical, archeological, architectural, and cultural resources. You should obtain the Council's substantive comments through the process outlined in 36 CFR Sec. 800.9 if an alternative is chosen which will affect these archeological properties. These comments should then be incorporated into any subsequent documents prepared to meet requirements under the National Environmental Policy Act. Brit Allan Storey may be contacted at (303) 234-4946 for further assistance.

Sincerely,

B. A. Storey

Acting Louis S. Wall
Chief, Western Division
of Project Review

RECEIVED
JAN 28 1981
ENVIRONMENTAL EVALUATION BRANCH

Response to Comments From the Advisory Council on Historic Preservation

1. The University of Idaho Laboratory of Anthropology has conducted a thorough investigation of the area that will be affected by Coeur d'Alene's proposed wastewater improvements (Alternative B1) and determined that no cultural resources on or eligible for inclusion on the National Register of Historic Places would be adversely affected by the project. The Idaho State Historic Preservation Office has subsequently issued a letter indicating the planned improvements to the City's treatment facility will have no effect on significant archeological or historic properties. Letters to this effect are included in Appendix B.

United States
Department of
Agriculture

Soil
Conservation
Service

Room 345
304 North 8th Street
Boise, Idaho 83702

March 3, 1981

Norma Young M/S 443
Environmental Evaluation Branch
U.S. Environmental Protection Agency
1200 Sixth Avenue
Seattle, Washington 98101

Dear Ms. Young:

Thank you for the opportunity to review and comment on the Draft Environmental Impact Statement for Wastewater Treatment Facilities for the City of Coeur d'Alene, Idaho. There are no comments forthcoming from our office at this time.

Sincerely,

Amos I. Garrison, Jr.
State Conservationist

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MAR 6 1981
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BRANCH

DEPARTMENT OF THE ARMY
SEATTLE DISTRICT, CORPS OF ENGINEERS
P.O. BOX C-3755
SEATTLE, WASHINGTON 98124

NPSEN-PL-ER

6 FEB 1981

Ms. Norma Young M/S 443
Environmental Evaluation Branch
U.S. Environmental Protection Agency
1200 Sixth Avenue
Seattle, Washington 98101

Dear Ms. Young:

We have reviewed the draft environmental impact statement for Wastewater Treatment Facilities for the City of Coeur d'Alene, Idaho, with respect to the U.S. Army Corps of Engineers' areas of responsibility for flood control, navigation, and regulatory functions. We have the following comments:

1 a. Development in the flood plain should be avoided. If there is no practicable alternative, development should be constructed to avoid serious damage or health hazards during a 100-year flood, as stated, but should also be designed to avoid aggravation of flooding to other property.

2 b. Page 23, line 2. The sentence on Section 404 requirements should read as follows: A Section 404 permit would be required for placing fill material in the river in conjunction with the pipeline installation unless the work is authorized by a nationwide permit. Any other type of filling in the river or on adjacent wetlands would require a Section 404 permit.

3 c. Tables and references to heavy metals should identify the parameters as either dissolved or total concentrations; for example, .245 mg/l dissolved zinc or .245 mg/l total zinc.

4 d. Page 53, first paragraph. Zinc is identified as exceeding Redbook and Fisheries Society criterion, although there appears to be no detrimental impact to aquatic organisms. This raises a question regarding the applicability of the criterion to any and all ecosystems and to its validity in general. Because of this question, should zinc be described as a metal of concern, or treated according to existing conditions?

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ENVIRONMENTAL EVALUATION

NPSEN-PL-ER
Ms. Norma Young

Thank you for the opportunity to review this statement. If you have any questions, please contact Dr. Steven F. Dice, telephone (206) 764-3624, of my staff.

Sincerely,

for SIDNEY KNUTSON, P.E.
Asst. Chief, Engineering Division

Response to Comments From the U. S. Army Corps of Engineers

1. Before EPA will make grant awards for wastewater facilities construction in the 100-year floodplain of the Spokane River, the City of Coeur d'Alene must make written assurances that any new or renovated structures are either expendable (in cost-effective terms) or are adequately protected by elevation, diking or similar physical means. Any improvements over $10,000 in value must be covered by flood insurance both during and after construction. This insurance must be acquired prior to issuance of a Step III grant.

2. The Draft EIS should be revised to reflect this statement on Section 404 permit requirements of the Army Corps of Engineers.

3. All heavy metals, including zinc, are reported as total concentrations.

4. The apparent contradiction between productive fish populations and zinc concentrations which exceed water quality criteria can be explained by one of three factors or a combination thereof. These factors are: 1) reported zinc concentrations are not in a form toxic to fish, 2) indigenous fish species have adapted to high zinc levels, or 3) laboratory tests used to develop water quality criteria are not applicable to field populations. EPA responds to the third assertion by stating that laboratory toxicity tests are useful predictors of what will happen in field situations (Federal Register 45, 231, November 28, 1980). In what is probably the most extensive comparison available of laboratory and field data (Geckler et al. 1976) it was found that effects observed in laboratory exposures were also observed in field exposures. However, avoidance, which was not studied in laboratory exposures, was observed in the field exposures.

   There is some validty to the first assertion that total zinc concentrations in the Spokane River are not in a form toxic to fish. Zinc was reported as "total recoverable zinc" which consists of both dissolved and suspended fractions. As a general rule, if a substance is not dissolved, it is not biologically or toxicologically available. In many situations the dissolved fraction comprises the majority of the "total recoverable zinc" measured. USGS has recently begun to report zinc concentrations in the Spokane River as both total recoverable and dissolved. The dissolved fraction comprises anywhere from 22 percent to 100 percent of the total recoverable zinc with most values exceeding 60 percent.

The assertion that indigenous fish have acclimated to existing conditions is in all likelihood valid. However, the apparent lack of reduced fish productivity is not based on hard scientific data but more on general observations of fish catches and the absence of large die-offs. It is possible that subtle changes in behavior and physiology may be occurring but are going undetected.

Bioassay studies on Spokane River fish are obviously preferable to single factor criteria for all water courses, but until such studies are conducted and resultant criteria formulated, zinc should still be identified as a metal of concern.

DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
REGIONAL OFFICE
ARCADE PLAZA BUILDING, 1321 SECOND AVENUE
SEATTLE, WASHINGTON 98101

January 28, 1981

REGION X

IN REPLY REFER TO:

10C

Ms. Norma Young
Environmental Evaluation Branch
U.S. Environmental Protection Agency
1200 Sixth Avenue, M/S 443
Seattle, Washington 98101

Dear Ms. Young:

Subject: Draft Environmental Impact Statement
Wastewater Treatment Facilities for the
City of Coeur d'Alene, Idaho

We have reviewed your statement submitted with your January 5, 1981 letter.

Since our Portland Area Office has jurisdiction over HUD programs in Idaho, they have also reviewed the statement and their comments are attached.

We certainly support economic as well as physical growth on a planned basis and that are consistent with locally developed comprehensive plans. However, we believe environmental impacts including secondary impacts should be addressed at the time growth inducing projects such as wastewater treatment plants or expansion of such plants are proposed. We further believe that EPA by doing so would make the compliance of follow-up projects with environmental regulations much easier and make for implementation of better projects.

We would also like to add that we are supportive of this project since we are fully aware of the importance of protecting the sole source aquifer.

We thank you for the opportunity to comment on your statement.

Sincerely,

Gordon N. Johnston
Regional Administrator

Attachment

RECEIVED
JAN 30 1981

Memorandum

U.S. DEPARTMENT OF
HOUSING AND URBAN DEVELOPMENT

January 22, 1981

To : Robert C. Scalia, Director, Regional Office of
Community Planning and Development
10C

Attn: Ry Tanino, Environmental Standard Officer

From : Clifford T. Safranski, 10.2S

Subject: Review of the EPA-DEIS
Waste Water Treatment Facilities for the
City of Coeur d'Alene, Idaho

Page 101 GROWTH INDUCEMENT AND LAND USE IMPACTS

1 Protection of Prime Farmland, floodplain and wetland values, aquifer protection from urban runoff and fiscal constraints including property tax limitations and archeological concerns suggest more definitive plans and/or agreements may be necessary.

In addition, the induced growth impact on police and fire protection, expansion of schools, increased streets, increased solid waste, increased water supply and replacement of 36 miles of wooden pipes and other services and facilities are left for the locality to resolve.

We would anticipate the generation of serious requests for HUD Community Development Block Grant funds, HUD/FHA mortgage insurance and requests to other Federal agencies for assistance in addressing needs generated by the induced growth that would be locally unmanageable without additional funding.

Under current and anticipated budgetary constraints we are unable to fund all the applicants with existing needs. Additional needs generated would be added to the competitive rating system and, if funded, displace another applicant.

2 The economics of scale may prohibit phasing of the sewage system from the standpoint of construction and maybe even for operating costs. However, if economics are achieved for one element at the expense of other elements, the cost effectiveness needs to be evaluated.

3 Regional or shared systems by localities within reasonable proximity has been a longtime goal and seems to offer more flexibility in timing of local impacts including dispersed costs.

AGENCY

PREVIOUS EDITION IS OBSOLETE

HUD-96 (7-75)

2

3 Although the DEIS suggests this was not considered popular and each locality wants its own facility, a full exploration of cost-benefit and public explanation of impacts may revive a regional system as an alternative worth considering.

Thank you for the opportunity to comment.

Environmental Clearance Officer

Response to Comments From the U. S. Department of Housing and Urban Development - Portland

1. Comments noted.

2. The treatment plant expansion is currently planned to occur in several phases, as described in the EXECUTIVE SUMMARY. The cost-effectiveness of this phased approach has been thoroughly analyzed in the Coeur d'Alene Wastewater Facility Plan (Chapter 9) published by Brown and Caldwell (1981) in July 1981.

3. EPA agrees that local interest in regional solutions to wastewater treatment may increase in the future. The engineering and institutional analyses conducted by the Cities of Post Falls and Coeur d'Alene, however, indicated that a joint or regional solution was not desirable economically or politically at this time. The current funding situation has encouraged individual solutions for near-term wastewater facilities needs.

United States Department of the Interior
OFFICE OF THE SECRETARY
PACIFIC NORTHWEST REGION
500 N.E. Multnomah Street, Suite 1692, Portland, Oregon 97232

RECEIVED
FEB 26 1981
ENVIRONMENTAL EVALUATION BRANCH

February 24, 1981

ER 81/30

Norma Young M/S 433
Environmental Evaluation Branch
U. S. Environmental Protection Agency
1200 Sixth Avenue
Seattle, Washington 98101

Dear Ms. Young:

The Department of the Interior has reviewed the draft environmental statement for Wastewater Treatment Facilities for the City of Coeur d'Alene, Idaho. The following comments are offered for your consideration in preparing the final statement.

General Comments

1 Recreation

Alternative G is preferred due to the finding of no significant increase in the discharge of pathogenic organisms during the heavy recreation use season. Selection of Alternative G would not impact existing recreation activities such as swimming, scuba diving and water skiing. Selection of Alternative A or E would cause an increase in fecal coliform counts and bacterial counts, especially during the peak summer recreation season when the river is low and less dilution is available. Swimming and water skiing near the outfalls would be discouraged under Alternatives A and E and recreational use downstream would decline as the water quality deteriorates, as stated on page 47 of the statement.

2 Cultural Resources

In accordance with the findings of the archeological resources investigation, conducted by Jones and Stokes Associates, we prefer Alternative G. No evidence of significant cultural resources was found near the Alternative G site or its associated irrigation sites. It is stated on page 95 that although no mitigations are currently anticipated for the Alternative G site, any excavation or ground-disturbing activity could potentially reveal significant archeological resources, and if this occurs, excavation should cease until a qualified archeologist is consulted. We would like to see this statement strengthened by saying excavation would cease if cultural resources are discovered. We were pleased to note that it has been recom-

2 mended that an archeologist be present during excavation of the interceptor routes north of the city, to determine presence or absence of artifacts.

3 Alternative B, extension of the present treatment plant, is not preferred, because it is within the heart of the most culturally sensitive area of the surrounding region (page 146-Appendix A). The loss of this area could not be fully mitigated. This is also true of site options 1 and 3 of Alternative E, which seem to have extensive intact cultural records.

4 Concern has been expressed about the quality of the river and the Rathdrum Prairie aquifer and about eutrophication of Long Lake (page 24). We suggest that treatment should be considered for abandoned onsite sewage systems following completion of the proposed wastewater facilities. Treatment would minimize any long-term contamination of ground- and surface-water resources that may result from the migration of toxic substances draining from improperly abandoned septic systems.

Thank you for the opportunity to comment.

Sincerely,

Charles S. Politika

Charles S. Politika
Regional Environmental Officer

Response to Comments From the U. S. Department of Interior, Office of the Secretary

1. Alternative G would have fewer potential surface water quality impacts than B or E, but it was determined that the added cost of Alternative G was not justified by the reduced impact. Proper treatment and disinfection under Alternative B1 will protect the beneficial uses of the Spokane River.

2. The City's preferred alternative, Alternative B1, will not affect archeological resources at the Alternative G disposal sites. EPA recommends, however, that similar steps be taken during construction at the Alternative B1 site if archeological materials are discovered during excavation.

3. See the response to the Advisory Council on Historic Preservation's letter for a description of a more recent archeological analysis of the Alternative B1 construction site.

4. EPA concurs that all abandoned on-site waste disposal systems should be properly pumped out and treated This cleanup is the responsibility of the City of Coeur d'Alene.

STATE OF IDAHO

DEPARTMENT OF FISH AND GAME

REGION 1
2320 GOVERNMENT WAY
COEUR d'ALENE, IDAHO 83814

February 24, 1981

Ms. Norma Young
Environmental Evaluation Branch
US Environmental Protection Agency
1200 Sixth Avenue
Seattle, WA 98101

Reference: M/S 443 Draft EIS
Wastewater Treatment Facilities
City of Coeur d'Alene

Dear Ms. Young

From the standpoint of fish and wildlife resources, those alternatives which would relieve nutrient loading in the Spokane River would be preferable. Of those alternatives considered Alternative G would have eliminated for the most part, summer loading in the river and greatly enhanced salmonid habitat.

Alternative E would provide the benefit of relieving the upper reaches of the Spokane River from current and future effluent impacts. This would be advantageous to cutthroat trout populations which seasonally use the upper mile of the river.

Should Alternative E become impractical from a standpoint of funding, our department would encourage the most cost effective approach to future wastewater treatment which would meet the projected water quality requirements of the US Environmental Protection Agency and Idaho Division of Environment. Should this involve expansion or alteration and use of the current wastewater treatment plant, we would encourage a design which would facilitate future incorporation of advanced treatment(s) which may become necessary.

Sincerely,

David Neider

David S. Neider, Regional Supervisor
Region 1

cc Bureau of Fisheries
Bureau of Program Coordination

RECEIVE
FEB 26 1981
ENVIR

EQUAL OPPORTUNITY EMPLOYER

Response to Comments From the Idaho Department of Fish and Game

1. While Alternative G would have the greatest positive impact on Spokane River fish and wildlife resources, its high cost is not warranted by the environmental benefits it would provide. In order to reduce the impact of the Alternative B1 waste discharge on the Spokane River, it is expected that when the City's NPDES permit is rewritten seasonal removal of phosphorus and year-round dechlorination of effluent will be required. While these advanced treatment processes are not to be part of the initial wastewater system improvements, they are to be added as soon as funding becomes available.

John V. Evans, *Governor*
Daniel T. Emborg, *Administrator*

State Capitol Building
Boise, Idaho 83720

DIVISION OF ECONOMIC AND COMMUNITY AFFAIRS

February 9, 1981

Donald P. Dubois
Environmental Protection Agency
1200 Sixth Avenue
Seattle, Washington 98101

Dear Mr. Dubois:

The Idaho State Clearinghouse has completed its review of the Draft Environmental Impact Statement WASTEWATER TREATMENT FACILITIES FOR THE CITY OF COEUR D'ALENE - SAI #00115340. The following agencies were contacted for their review and comment:

Panhandle Area Council
Department of Health and Welfare/Division of Environment
Department of Transportation/Division of Highways
Idaho Historical Society
Department of Fish and Game

The Department of Health and Welfare/Division of Environment stated comments will be made to EPA through their normal channels. A copy of their comments is attached for your perusal. Comments were not received from the other reviewing agencies. Any late comments received, will be forwarded to your office.

Thank you for the opportunity to assist you in the review of your Draft Environmental Statement. Please send us a copy of your Final Environmental Impact Statement when it is completed. If you have any questions, please do not hesitate to call either myself or Lois Wade at 308-334-4718.

Sincerely,

Gloria Mabbutt

Gloria Mabbutt, Coordinator
Idaho State Clearinghouse

GM/lw

enclosure

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FEB 12 1981
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IDAHO
A Land For All Seasons

STATE OF IDAHO

DEPARTMENT OF HEALTH AND WELFARE

DIVISION OF ENVIRONMENT
Statehouse
Boise, Idaho 83720

March 20, 1981

RECEIVED
MAR 23 1981
ENVIRONMENTAL EVALUATION BRANCH

Ms. Norma Young
Environmental Evaluation Branch
U. S. EPA
Region X - M/S 443
1200 Sixth Avenue
Seattle, Washington 98101

Dear Ms. Young:

The Division of Environment, Idaho Department of Health and Welfare, has reviewed the draft EIS *Wastewater Treatment Facilities For The City of Coeur d' Alene, Idaho* and wishes to submit the following comments:

1) Pg. xiv, 1st paragraph - EPA only offers various funding options. It is ultimately the Grantee's decision to implement a project.

2) Pg. xiv, 3rd paragraph - The EIS lists impractical rehabilitation of equipment at the present treatment site as one reason the Citizen's Advisory Committee preferred Alternative E. This is not entirely correct. If rehabilitation were impractical, Alternative B would not have been the least cost alternative.

3) Pg. 14, Probable Effluent Limitations - The heading and wording of this should be rewritten. Effluent limits are currently available and have been since February, 1980. The heading for this section should merely be Effluent Limits, and should point out the following:

   Before Coeur d' Alene began facilities planning, when initial limitations were being developed, EPA conducted its own studies on the Spokane River and developed a model to evaluate the impact of the Coeur d' Alene and possible Post Falls discharges. In February, 1980 after the facility planning had started, the final effluent limitations were given to Coeur d' Alene based on the EPA studies.

EQUAL OPPORTUNITY EMPLOYER

3 At the time the facilities planning began the State of Washington was required to conduct a waste load allocation study on the Spokane River. As a spin off of their study, Idaho was offered a small 208 Grant to supplement the Washington study and to provide additional information to enhance the EPA model. Possible modifications in the EPA model may allow a relaxation in the present effluent limitations.

4) Pg. 14, Effluent Limitations - Alternative G (Land Application) may not be required to achieve 30-30. The land is serving as partial treatment.

5) Pg. 17, Action Proposed by the City of Coeur d' Alene -

The statement that Alternative G was rejected because of the risk of contaminating the Rathdrum Prairie Aquifer (Thompson pers. comm.) may not be entirely correct. The Citizen's Advisory Committee, at the direction of Bruce Thompson, requested effluent limits of EPA for land application over the aquifer. EPA (Bob Burd) was not the appropriate agency to produce these limits, as they were being developed by our department at the time in accordance with Idaho Water Quality Standards & Wastewater Treatment Requirements. Bob Burd did, however, respond to Mr. Thompson and detailed all possible protection measures that may be required of a sole source aquifer. EPA could not give definite parameters since the sole source regulations have not been finalized.

The vague requirements detailed by EPA in their August 6, 1980 letter to Bruce Thompson (Committee Coordinator) suggested to the Advisory Committee many uncertainties as to future regulations and requirements that may be attached to their land application site. This, rather than fear of contaminating the aquifer, steered the Committee away from Alternative G.

6) Pg. 24, Existing Water Quality - The following sentence needs to be clarified: "Available records indicate that water quality in the Spokane River between Coeur d' Alene and Post Falls (Table 2 - 1) is satisfactory although several parameters are not in compliance with proposed draft EPA water quality criteria (Federal Register)."

7) Pg. 58, Character of the Aquifer - States: "The present water quality of the aquifer is described as good, with a very small percentage of water samples showing contaminants in excess of the maximum contaminant levels." The EIS should continue here to detail what MCL's have been exceeded and at what location in the aquifer.

8) Pg. 62, Resultant Regulatory Controls - 3rd paragraph - The Spokane Valley/Rathdrum Prairie Aquifer is classified as a Special Resource Water. The State Water Quality Standards no longer have an antidegradation policy. The present Water Quality Standards state:

> The waters of the Spokane Valley/Rathdrum Prairie Aquifer, as described by the U. S. Environmental Protection Agency in its designation as a "sole source" aquifer under Section 1424(e) of the Safe Drinking Water Act, must not be lowered in quality, as relates to appropriate beneficial uses, as a result of a point source or non-point source activity unless it is demonstrated by the person proposing the activity that such change is justifiable as a result of necessary economic or social development.

9) Pg. 75, EPA Mitigation Strategy - The guidance summarized under this section was only first cut recommendations by EPA, i.e. a place to begin negotiations. IDHW has since, in conjunction with EPA, significantly reduced and refined specific requirements for land application over the Spokane Valley/Rathdrum Prairie Aquifer.

10) Pg. 101, 1st paragraph - The State will not allocate projected population increases to specific areas of the county. This should ultimately come out of the 208 Study or through county allocations. These projections cannot, however, exceed State projections for total populations in unincorporated areas. The final numbers should probably be a result of coordination between IDHW, 208, and the county.

11) Pg. 109, paragraph 3 - States: "The City of Coeur d' Alene should conduct an environmental assessment of prime agricultural land losses prior to constructing new wastewater interceptors into the prime farm land areas." Since portions of these interceptors are allowable under this project, why does this EIS not cover the environmental effects of prime agricultural land losses?

12) Pg. 111, 1st paragraph - IDHW-DOE should be consulted in the environmental assessment of the Blackwell Island Development.

Thank you for the opportunity to comment on this Environmental Impact Statement.

Sincerely,

Lee W. Stokes, Ph.D.
Administrator

LWS/WH/b

Response to Comments From the Idaho Department of Health and Welfare

1. This is correct; EPA only offers grant funds to local jurisdictions. It is the local jurisdiction's option whether or not to accept the funds under specified conditions.

2. The reasons for preferring Alternative E that are listed on page xiv are those of the Advisory Committee and the City, not EPA. The validity of these reasons was not assessed in the EIS.

3. The Draft EIS should be revised to reflect the suggested rewording of the section on Effluent Limits.

4. Comment noted. Alternative G is no longer being considered by the City of Coeur d'Alene.

5. The threat of aquifer contamination was stated by Mr. Thompson as a concern of the Citizen's Advisory Committee. While the uncertainty of future regulatory requirements was also undoubtedly a factor in the decision to pursue Alternatives B and E rather than Alternative G, aquifer contamination was considered a significant issue by the Advisory Committee.

6. Surface water quality data reported for the Spokane River near Coeur d'Alene show levels of zinc and copper that exceed EPA recommended criteria for the protection of freshwater biota. These criteria were reported in the Federal Register on November 11, 1980 (Federal Register 45 [231] FR 79318-79323; Section 307 [a] [i]). While the heavy metals levels exceed criteria for protection of freshwater biota, the river water quality does not currently pose a threat to human health.

7. National Interim Primary Drinking Water Regulation MCLs have been exceeded for nitrate, arsenic, lead, chromium, mercury, turbidity and microbiological agents (coliform bacteria) in the Spokane, Washington area. Nitrates have also exceeded MCLs near Dalton Gardens and Rathdrum, Idaho. High levels, however, were reported in a very small percentage of the water samples analyzed (Esvelt 1978; Drost and Seitz 1978). Groundwater from the urban-industrial portions of central Spokane Valley contained the majority of the high readings.

8. Comment noted.

9. The mitigations suggested on pages 75 and 76 of the Draft EIS were identified as preliminary guidance; more formal requirements were being developed by EPA and the State of Idaho.

10. EPA agrees that allocation of unincorporated area populations in Kootenai County should be a combined effort of IDHW, the county and 208 plan staff.

11. The Draft EIS identified the potential for prime agricultural land losses due to planned urbanization. The suggestion that the City conduct environmental assessments of interceptors prior to their construction was based on the fact that the timing of their construction and the sources of funding were not known at that time. As these interceptors are further planned, the City should investigate ways to avoid urbanization of prime farmland if at all possible.

12. EPA concurs that the IDHW should be consulted in any environmental assessment of the Blackwell Island development.

Chapter 2

ORAL TESTIMONY ON THE DRAFT EIS AND EPA RESPONSES

Introduction

A public hearing on the Coeur d'Alene Facilities Plan Draft EIS was held in Coeur d'Alene, Idaho on February 18, 1981. The following pages contain the transcript of the oral testimony presented at that hearing. Each comment requiring a response has been identified by a line and a number in the left-hand margin of the transcript. Following the transcript, each comment has been responded to in numerical order. If the comment has been responded to in the text of an earlier chapter, the reader is referred to that chapter.

U.S. ENVIRONMENTAL PROTECTION AGENCY

PUBLIC HEARING

Re: Draft Environmental Impact Statement

Taken at: Coeur d'Alene, Idaho
Date Reported: February 18, 1981

HESTON and HOWELL
REPORTING SERVICE
Certified Shorthand Reporters
Lewiston, Id. (208) 743-1511
Coeur d'Alene, Id. (208) 664-8244

A Public Hearing was held in the matter of the Draft Environmental Impact Statement for Wastewater Treatment Facilities for the City of Coeur d'Alene, Idaho, before Charlotte R. Crouch, a Notary Public, at the Coeur d'Alene City Council Chambers, Coeur d'Alene, Idaho, at the hour of 7:30 p.m., February 18, 1981.

Appearances were:

Mr. Roger Mochnick, Hearing Officer, EIS Preparation Coordinator, Environmental Evaluation Branch, Seattle, Washington.

Mrs. Norma Young, Project Monitor, U.S. Environmental Protection Agency, Region 10, 1200 Sixth Avenue, Seattle, Washington, 98101.

Mr. Richard C. Bain, Jr., Vice President of Brown & Caldwell, Consulting Engineers, 100 West Harrison Street, Seattle, Washington, 98119.

Mr. Michael D. Rushton, Jones & Stokes Associates, Inc., 105 South Main Street, Suite 203, Seattle, Washington, 98104.

The Public Hearing was reported in stenograph by the Notary Public, Charlotte R. Crouch, of the firm of Heston & Howell Reporting Service, 816 Sherman Avenue, Coeur d'Alene, Idaho, 83814, and by her later transcribed.

WHEREUPON, the following proceedings were had and testimony given, to-wit:

HESTON and HOWELL
REPORTING SERVICE

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QUESTION AND ANSWER SESSION 29

HESTON and HOWELL
REPORTING SERVICE
Certified Shorthand Reporters
Lewiston, Id (208) 746 1331
Coeur d'Alene, Id (208) 667 8244

MR. MOCHNICK: My name is Roger Mochnick, and I am with the Environmental Protection Agency in Seattle, Washington. Mr. Donald Dubois, our Regional Administrator, has delegated me to be your Hearing Officer for tonight's proceedings. We appreciate your attendance tonight, and we are glad that you are here to discuss the many issues associated with the City of Coeur d'Alene Wastewater Treatment Works Project.

For purposes of the hearing record, I would like to note that this public hearing was convened at 7:36 p.m., February 18th, 1981 in the City Council Chamber of the City of Coeur d'Alene, Idaho.

As Hearing Officer, I would like to take a few minutes to tell you the purpose of tonight's hearing, describe the hearing agenda, which will lead to orderly presentations by each of us here. Even though this is an informal public hearing, I would also like to pass along a few rules of procedure which will assist us in making sure that everyone has the opportunity to participate in the discussion. Our primary purpose tonight is to provide the opportunity for local citizens to comment on the recently published documents, the City of Coeur d'Alene's Draft Facilities Plan for Wastewater Treatment Facilities, and EPA's Draft Environmental Impact Statement.

The City has applied to the Environmental Protection Agency for grant assistance in accordance with Section 201 of

HESTON and HOWELL
REPORTING SERVICE

the Clean Water Act for purposes of upgrading the City's sewage treatment facilities. Wastewater treatment improvements are needed for the City to comply with its National Pollution Discharge Elimination System Permit for affluent requirements. EPA has previously awarded to the City a Step 1 Planning Grant to develop the facilities plan, which outlines a number of alternatives for improving the affluent quality and for expanding service to City residents, and residents of the adjacent urbanizing areas.

The Draft Environmental Impact Statement has been prepared by EPA. It consists of an evaluation of each of the alternatives identified in the City's facilities plan. The EIS has been prepared pursuant to the National Environmental Policy Act. The EPA is required to prepare such statements on major Federal actions which could have a significant impact on the quality of the environment. The Federal action in this case would be an EPA grant to the City of Coeur d'Alene, which along with the State of Idaho grant funds would assist the City in Step 2: designing the selected facility; and Step 3: actually constructing the selected facility. However, before any decision can be made regarding the award of additional grant funds for this project, the EIS process must be completed. The remaining steps in the process include receipt and review of public comments on the Draft Facility Plan and EIS, both at this public hearing and through written

HESTON and HOWELL
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Lewiston, Id. (208) 746-3431
Coeur d'Alene, Id. (208) 667-8244

submissions. Preparation of a final Environmental Impact Statement and receipt of comments during a 30-day review period following publication of that EIS.

For those of you who need a detailed account of the EIS process, it is sometimes complex and I will be here and be more than willing to discuss it with you later this evening.

Again, let me emphasize that the purpose of tonight's hearing is to receive oral comments on the City's facility plans and EPA's EIS. We are not going to try to limit the scope of your inquiries or your input, but I hope that each of you in your comments and statements will keep our purpose in mind.

Those wishing to testifying at this public hearing have been encouraged to review the draft documents. EIS has been on file at the Coeur d'Alene Public Library since January 1981. Copies were also mailed to State and local officials, and to numerous citizens of the area. Persons unable to testify at tonight's hearing or wish to furnish comments after the hearing may do so by writing Norma Young at EPA's Regional Headquarters, 1200 Sixth Avenue, Seattle, Washington 98101. The close of comment period is March 2nd of 1981. Norma Young is the Project Monitor on this EIS for the EPA. She is sitting on my far left. If you need that address, we will be glad to give it to you a little later on.

I would also like to make mention now at this time

HESTON and HOWELL
REPORTING SERVICE

that all questions from the floor are to be held until the third stage of this hearing. A question and answer period will be held after all interested parties have had the opportunity to present oral comments. And given the amount of people we have so far who have signed up to make presentation, we should have sufficient time to answer all your questions.

I'd like to next give you the agenda for this hearing and introduce the two other people sitting with me. On my right is Mr. Richard Bain from Caldwell Consulting Engineers. Mr. Bain will give a brief presentation on the various alternatives and costs which are included in the facility's plan. Brown and Caldwell are consultants to the City who prepared the facility's plan.

On my left is Mr. Michael Rushton of Jones and Stokes Associates. Mr. Rushton will give a brief presentation outlining the more significant environmental impact associated with the alternatives. Jones and Stokes are the consultants who assisted EPA in the preparation of the EIS.

After these two short presentations, we will receive oral comments on the project and documents. I will call on the individuals in the order that I have received their cards. Following the presentation of testimony, we will begin the question and answer period. I am aware that there are recent developments of important issues associated with this project, and I am sure you will want to discuss them. Please hold

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those questions until the latter stage of this hearing. Questions may be asked of Mr. Bain or Mr. Rushton through me. As Hearing Officer, I reserve the right to limit questioning, call recesses, adjourn, and reconvene the meeting. I am going to ask that presentations be limited to ten to fifteen minutes. Written material should be left with me following your presentation or sent to Mrs. Young at EPA's Regional Office in Seattle for inclusion in the record. You are under no obligation to submit written material. A written account would help us consider your statement more fully and keep our record in order. Written comments received on or before the close of comment period on March 2nd will be responded to in the final EIS.

A record of the hearing is being made by the court reporter, therefore, I ask that when you speak, you speak clearly, state your name, address, and affiliation, if any. Also, it will be helpful if you would come forward so that the audience may hear your comments and you will be more easily picked up by the court reporter and I think this would be the podium right here, if you would.

Copies of this transcript will be made available for your inspection at the EPA's office, of course, in Seattle, but also the City library and the offices of the City here in Coeur d'Alene.

Are there any questions as to the procedures that we

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are following tonight?

(NO RESPONSE.)

Okay, Dick Bain.

MR. BAIN: I'll briefly outline the facility planning work that was done last year, and then try to bring you up to date a little bit on where we are, given the funding situation that all of you are aware of. This is the facility plan document in draft form that was submitted to the City last November. I'd like to briefly go over all the alternatives described in that, and some of the assumptions used at that time, and discuss briefly those costs that we had developed at that time, and then switch to the present situation in order to bring you up to date on the situations that relate to funding and options that might now be available to the City, given the reduced funding that's been announced.

This map here, which you can look at at your leisure after the meeting, but I think most of us will recognize that this is the City of Coeur d'Alene planning area of the City right here, and the Spokane River flowing here (indicating). In developing the facility plan, we first had to become acquainted with the existing facility, which is located in this area near the Fort Grounds. It's currently a secondary treatment plant which is processing approximately two million gallons of water each day during the peak summer months. The flows in the wintertime do get higher than this flow because

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of the direct inflow connections from rain water in City streets and off roof tops.

As we looked at alternatives, we had to first consider the population of the area and what forcasted growth we could see in a 20-year period beginning in about 1985 through to the year 2005. We translated these projections to flows, and we're dealing with approximately six million gallons in the year 2005 for our sizing of our facilities. Because this represented rapid growth, it was necessary to stage our plan and consider a ten year increment, something that would take us approximately to 1995, which we were using as 4.2 million gallons. Those are the numbers that we used to generate the sizing of the sites and plan facilities necessary for the City's population.

The other issue that we had to deal with was: What other requirement were we to meet? Was it to continue to discharge at the present level of treatment, which is a basic secondary treatment, or to some higher level of treatment, which was being suggested by regulatory authorities last year. These higher levels of treatment involved increased processing from reduced oxygen consuming substances, increased treatment to reduce other substances involving ammonia compound so that the ammonia in the waste would be oxidized, and the probability of a future requirement for phosphorus removal because of issues across the state line in Long Lake which the State of

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Washington and others suggested would require controls in the State of Idaho. We received guidance last year on what these limits would be. As a result of not having prescribed affluent specifications, but rather some guidance, we had to look at a worst-case analysis for what treatment processes we were going to consider. So, we had to look at high-side or worst-case situations as in regards to the facilities because we had to look at the worst case in the affluent prescriptions, and that caused the cost to be high.

We had 27 options that we looked at with the committee initially, and I won't go through all of those. I think that's too many for this meeting, but there is some discussion of that in the EIS, and in the facility plan. We narrowed that down to basically four: Alternative A, which basically is a no-action alternative, to stay where we are, not expand, and to basically rely on septic tanks; an action that's not currently acceptable to the regulatory authorities, but is base case, if you will. Therefore, there are no capital costs associated with that. It's just where we are, continuing to operate.

The second alternative that survived the screening process was to expand at the existing site or adjacent to the existing site and still continue to discharge to the Spokane River. We call this Alternative B, and it did involve a plant which ultimately, out in the future, could cost on the order of

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$19 million when you consider the six million gallon flow that I mentioned, and the worst-case situation. In fact, that was for secondary. A strict level of secondary, there were some additive costs with phosphorus removal and ammonia nitrification.

The other alternative that survived was Alternative E, which involved a down-river plant. In other words, ceasing the treatment function at this point and putting in a pump station and pipeline, moving our treatment plant function to some point down river, a mile or so. Three sites were identified for this alternative. We developed costs for this, and they continued to run about two million more than Alternative B. Somewhere in the order of $21 million for the full planning period, that's including both stages. This alternative would -- the basic difference was the pipeline and the fact that we had to abandon existing structures at the present site.

The fourth alternative, which was looked at for a while and is covered in the EIS, involved retaining the existing site, retaining the existing treatment plant with some improvements, but modest improvements, and going to some form of affluent irrigation after basic treatment with aerated lagoons, somewhere here in the north (indicating). We called this Alternative G, and it involved aerated lagoon treatment with storage and land irrigation, with discharge of the waste-

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water in the wintertime back to the river, and retention of this existing plant with discharge to the river all year from that small plant. This plant would have served the northern part of town in the north, and the southern part of the existing site. That alternative received a lot of discussion because of potential effects on the aquifer, which I will refer to the EIS writers. It had a cost on the order of $26 million, considerably more than the others, and also some controversy related to the aquifer. Now, those costs and those requirements are little bit passe right now because of two things. One: Some discussions with regulatory agencies which would appear to lead us to at least near term consideration of less requirements, requirements that are more close to what we call basic secondary treatment, at least that possibility is there. It's not official, we don't have it in writing, but there's some possibility that some lesser stringency could occur in the next five years. However, there is still a likelihood for phosphorus removal down the road and additional treatment down the road for removal of ammonia nitrogen. In addition to that, the money available to fund these projects, which is usually in the past -- recent past -- have been on a formula of 75 per cent of the capital cost being from the Federal grant, 15 per cent being from a State grant, and 10 per cent raised locally for the construction and related design. The Federal grant program is being cut back, we are

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trying to keep up with this. The latest I have today would indicate that there may not be any money for the next year or at least if there is, it will be sometime before we know whether there will be any money for Coeur d'Alene. It's doubtful whether there will be any money for Coeur d'Alene next year at best. There is a little money this year, and perhaps some money further down the road in '80 or '85, but it's still very much up in the air. Because of this and because of the changes in affluent prescriptions, we are looking now at several options that would involve use of the existing site trying to get as much capacity as we can on that site, and see what the cost would be for either minor upgrade of the existing plant or installation of new structures, whether those be tailored structures to fit in with the existing configuration or a separate plan such as a package-type plan that would exist just down river from the present trickling filter, which is the large structure on that site. We are preparing a report in dealing with the regulatory agencies and bringing the information on a process evaluation to the City after we talk this over again with the regulatory people and with the Citizen's Advisory Committee, and the City staff. So, this will be occurring in the next month or so, a month or six weeks.

So, that's the new business. There will be a greatly reduced scale on the cost somewhere in the order of anywhere

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from $500,000 to less than $2 million. That's the sort of numbers we are looking at as being attainable to get some capacity to allow the moratorium to be lifted. I think that's the first order of business, to get some additional capacity so that the moratorium can be lifted and so then that other improvements could then follow in due course.

That's an update. It's hard to predict all the funding issues, but that's my summary for now, Roger.

MR. MOCHNICK: Mr. Michael Rushton of Jones and Stokes will be giving a presentation on the Environmental Impact Statement.

MR. RUSHTON: I'll be brief in this discussion. I just wanted to first mention what the process that we have gone through has been. We started work on this environmental review back in June of 1979 when the facility planning got underway, and for the first year of your involvement we pretty much checked the background data in the area and attended the Citizen's Advisory Committee meetings that were held for the facility's planning process, and we also in that role gave advice and discussed at several of the meetings the environmental concerns that we saw that were coming up from the various alternatives that Dick Bain's firm were developing for the City.

Finally, we participated in the screening of the project alternatives that got down to the three basic alterna-

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tives that were analyzed in the facility plan. In the last six months we've been putting together the Draft Environmental Impact Statement, which the hearing is on tonight.

Once this hearing is over we will continue, and our next objective will be to compile all the comments on the EIS, both written and oral, and prepare a final Environmental Impact Statement that will address all those comments and concerns on the Draft EIS. Approximately a month after the final EIS is published, EPA will be free to make some sort of decision on the funding of the facility in the City of Coeur d'Alene.

I'd like to briefly run through some of the major environmental concerns that are discussed in the Draft EIS. These first few are common to all of the major project alternatives that Dick Bain identified: Alternatives B, E, and G. First, all of the major project alternatives would eliminate the occasional discharge of poorly or untreated wastewater that occurs from the City's treatment plant when there's a hydraulic overflow during rainy periods or snow melts in the area. All of these alternatives would also allow new development in the City to be hooked into the City system, and growth to occur. They would also eliminate existing septic tanks over the Rathdrum aquifer that are now serving approximately 5,000 people. This would occur over a period of

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time. These septic tanks would be eliminated as the people would be hooked into the new expanded system. These septic tanks and draining systems are now contaminating the aquifer which is the principal water supply for this area and for downstream areas in the State of Washington.

If the wastewater facilities are constructed as planned as described in the facility's plan, and the Coeur d'Alene area grows as envisioned in wastewater facility's plan and the local land-use plans, there would be approximately 2,300 new urban acres added to the City of Coeur d'Alene by the year 2005. Some of this planned development as envisioned in the City plan would occur in environmental sensitive areas. The areas that we discussed most heavily in the Environmental Impact Statement were prime agricultural losses that would occur from this development. Also, some commercial and residential development that was planned in flood plain areas and wet areas, and also some development that would occur in areas of cultural resources along the banks of the Coeur d'Alene River.

EPA is responsible for protecting the natural resources like wetlands and prime agricultural lands, and these other cultural resources such as archaeological materials. Therefore, the Environmental Protection Agency is concerned about these losses that would occur and would hope to discuss those things with the City before providing grant

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funds for the expansion of the wastewater facilities.

Each of the project alternatives also have other specific impacts that relate primarily to the location of the facility that Dick talked about.

I'll go up to the map now. Alternative B, which is an expansion at the existing site located here (indicating) on the river would have several fairly significant impacts that we identified. First, there would be some land-use conflicts that would occur with an expansion in this area. In talking with the local planners and people in the area, there are some plans for commercial developments and condominium development in that area, and there's also plans from North Idaho College for expansion in that section, and we saw this as a possible land-use conflict down the road. The archaeological work done for us by the Laboratory of Anthropology at the University of Idaho also determined that there is a significant archaeological site in the vicinity of the existing treatment plant and that expansion into undeveloped land around the existing treatment plant could adversely affect those archaeological resources. And also, with expansion at B and continued discharge here, you would have a continued increase of wastewater in the Spokane River and in downstream areas. The facility plan identified the local share cost of this alternative as $1.77 million, and as Dick has mentioned, these numbers are going to be changed as these alternatives

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resolve in the future here.

Alternative E, which would be moving the plant downstream to one of three possible locations, has no major land-use conflict that we could identify. It would, in fact, remedy existing conflicts at the treatment plant site that you have now. There would be archaeological disturbances that we could identify if the middle of the three sites were selected. The middle site is an existing gravel pit, and that site has been disturbed heavily already, and, therefore, would not involve any possible loss of any archaeological resources if it were used. This move would obviously move the waste discharge the river about one mile down, further downstream from the City. This moves it away from the City, but it moves it about a mile closer to what the Panhandle Health District has identified as approximately 160 people that draw domestic water from the river down between the City of Coeur d'Alene and the state line. The local share cost of that alternative was identified as about $1.94 million.

And the final alternative, Alternative ~~B~~ G, which has two treatment plant sites maintaining the existing site and building lagoons in the north area for a portion of the flow, the major alternatives we discussed for that alternative were: continued land-use conflict at the existing site, the treatment plant closely located to residential and developing areas, possible land-use conflicts in the proposed lagoon areas. The

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County's comprehensive plan shows this particular portion of the County as a transition zone between agricultural and residential areas with possible residential development in the long-term in that area. There were no significant archaeological impacts identified with Alternative G. As far as water quality goes, that alternative would keep summer discharge to the river at its present volume level, and its present location in the winter. However, you would have the discharge of the expanded area to the river down here (indicating) if you were about a mile downstream from the existing plant, proposing the same general public health concerns I mentioned for Alternative B with the site moved closer to those domestic water users downstream.

Finally, Alternative G with its spray irrigation disposal of the wastewater in the summer up here (indicating) poses a potential threat to the ground water quality and integrity of the Rathdrum Prairie aquifer, which underlies this large agricultural area to the north of Coeur d'Alene. The local share cost of the alternative was identified as about $3.17 million.

That basically summarizes the major environmental concerns that we put in the Draft EIS. I'll turn the hearing back over to Roger.

MR. MOCHNICK: Thank you. Okay, with that, I think we can proceed now to those people who would like to make

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presentation on either the facility plan or the EIS, and the first name we have is Mr. Ray Koep.

MR. KOEP: I'm Ray Koep. I'm a Coeur d'Alene City Councilman, and Chairman of the Public Works Committee. I've been dealing with the sewer problem of Coeur d'Alene now for about eight years. I learned something last night, however. I thought all the wastewater overrun and high water went into the Spokane River, and I understand some of it ends up in the bathtubs in the Fort Grounds, and the lady that made that point was very concerned that we might be adding an eleven story building into the system. She felt sure that that would fill her house, not just the bathtub, and that highlights a concern that I have as a councilman, and I would like to speak to that for just a moment.

For the sake of brevity, I straightened out the Spokane River here (indicating on chalkboard), and this might be Sandpoint, this is the far side of the City of Spokane, this might be Athol, and Coeur d'Alene, state line, and the city limits of Spokane. Until you get to Coeur d'Alene -- oh, incidentally, I'd like to say that that overburden -- and I'm going to be talking in real round numbers because there could be some mistake on this, but that overburden of debris that came down with that dam breakage 10,000 years ago left about 400 feet of overburden in -- this is really exaggerated -- in Sandpoint, and something like 325, say for numbers in Athol,

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and 250 in Coeur d'Alene, at the state line about 125. I think at the city limits of Spokane it runs from 50 to 75 feet. I read a handout at the Health and Welfare office in Boise a while back.

Another point I'd like to make is that in 1950 there were five sewer treatment systems in the State of Idaho, and Coeur d'Alene was one of them. Boise had the most expeditious, they dumped the water in the Boise River at the time, but we at that time had been treating sewage, I guess, for 15 years or something like that. We'd been in the business, we'd been working hard and spending a lot of Coeur d'Alene taxpayer's money to get this job done, and we keep working at it.

Now, back to this thing: Until you get near Coeur d'Alene there's virtually no pollution down through this water flow down here. Simply because there is not much industry and there's very little pollution. When you get to the state line -- let's see, we have sewer treatment in the City of Spokane. Incidentally, this overburden comes down here, and this area on the west side of Spokane is surfacing of that water system, that sole-water source. This area here is treated. Now, this is an area that I have concern with, from here to here (indicating). Estimated -- and these are very rough estimations -- that there are more people here polluting the aquifer than there is all the way from Pend Orielle Lake to that area. It has to be in the order of a

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hundred thousand people, and there isn't a piece of pipe in the ground in this area, and from what we can see -- and our concerns are political because we have businesses and taxpayers, people wanting to develop and live here, they cannot develop because of tight restrictions that exist here in Coeur d'Alene. And when you get to the state line, from what we can see, there are no restrictions, at least our people who would like to build in Coeur d'Alene must go across the state line where they have ~~untraveled~~ unfettered building, and we don't understand that: Why there is a different standard here where the chance for pollution is much heavier, the ease of pollution, because the overburden certainly appears to be a lot worse. We even halfway between here have the City of Post Falls and another problem, another thing that we can't understand is this particular city has been deemed to be an imminent health threat to this aquifer, and we have honestly endeavored to find out why that was. The best we can find out is that it was -- and don't misunderstand me. I certainly don't begrudge the City of Post Falls what they are getting, they need it, and they have worked hard for it. They are fine people, and we support them, but I understand that there was an involvement with their water supply. Now, to my knowledge, at least, they haven't had to close their water supply. We in Coeur d'Alene have had our biggest water supply -- our Fourth Street well has been down, and I'm not sure if it's

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a year or a year and a half, something like that, but it's been totally back into the system again because we think we have determined the source of pollution and have cut it off. We believe that to be the case, and we are back using the well, but we did have the involvement, yet, somehow we don't seem to qualify. We are not enough of a hazard, apparently, to be qualified as an imminent health threat, which we think would give us more support in our applications. On the other hand, we seem to be somewhat of a threat because we have an imposed moratorium by the Health authorities. I'm not questioning that; I mean, this certainly should be able to be substantiated why they have come at that, but I just can't understand the dichotomy of the thing, and it just doesn't make any sense that we would be riding the fence like that. So, I would hope that we'd see a solution where we would either have someone acknowledge the fact that we are actually a health hazard or deny it and allow us accordingly to continue with our development.

That's about all I have.

MR. MOCHNICK: Thank you, Mr. Koep.

Earl A. Ferrier. Is it F-E-R-R-I-E-R?

MR. FERRIER: That's correct.

I live down the river about two and a half miles at Harbor Island. Now, this condition that we have on the river doesn't occur every day, but every time it rains in Coeur

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d'Alene, why, we get your raw sewage from Coeur d'Alene. Now, this is -- I don't think it can be disputed because that river has been tested, and sometime ago it was ascertained that it was raw sewage being put in the river, and there was a big fuss at that time. The superintendent resigned, and he'd been falsifying the records.

Now, there's a whole lot -- there is several people on the island that take their water off the river, and I'm sure they must chlorinate it or else they'd be taking a heck of a chance. On down, there's a whole -- about possibly a mile and a half down, there is the Green Ferry Water District. It takes all their water from the river. Now, is there any reason that we should -- that Coeur d'Alene should be allowed to dump raw sewage against the laws and rules of the EPA? Now, they've already told them this.

Now, you keep talking about money up here. Well, Coeur d'Alene should generate the money and take care of this sewage, not dump it in the river. Spokane has.

I want to remind you that the people in Long Lake won a suit against the City of Spokane because they dumped raw sewage in the river.

Now, if anybody can dispute that there is not raw sewage going in, they should have looked at the river this morning. Half an inch of rain last night, and the river was a foam on top this morning. Now, was there no water -- no

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sewage went in last night? I don't know. Go see along that valve down there.

That's all I have.

MR. MOCHNICK: Thank you very much.

Barry G. Schuler.

MR. SCHULER: I'm Barry Schuler, President of North Idaho College and I am here to reiterate our position on this matter, and that is that Alternative B, which would involve any expanding of the existing site, we are very much opposed to. For obvious reasons, our expansion, our future growth must be in that direction. We already don't like the nearness to the present plant facility. We object to the offensive odors, particularly in the summertime, but I think it should be pointed out that we have obtained Federal funds recently to develop now the whole beach area as a major recreational site. The north end of that area would be very close to the present plant. We are putting in restrooms, bicycle paths, picnic tables, those sorts of things to now make that beach more useful to the general public.

Also, obviously, the existing situation is not very ideal for the college campus itself. The students in good weather are out of doors involved in sports in the athletic field very near to that site if you get down to the northern end of that field. The dormitory is not too far away, also. It's on that end of the campus, and all these things are

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objectionable already to the facility as it now exists, and we certainly do not want to expand it.

I think you need to know that North Idaho College is Idaho's fastest growing institution of higher education. We have grown an average of nine per cent per year since 1976 in our full-time equivalent student body. We presently serve on the Coeur d'Alene campus over 2,000 students. This is our largest semester ever. We grew even over the fall semester, which is a rather unusual occurrence. So, we are now serving over 2,000 students on the Coeur d'Alene campus this semester, and that does not count the satellite campuses that we operate in other counties in the area. Therefore, we must look to the north for our future expansion. We have every reason to believe that this growth is going to continue as the population increase continues in Kootenai County. And we can't go to the east very well since you are talking about a residential area that exists there. We obviously can't go to the south or to the west because we are bound by the lake and the river on those sides. Our only possibility for the future is to go to the north. So, we were rather pleased when we heard that Alternative E was the one that would probably be selected because it was our anticipation that that would then free up some land that we could purchase from the City of Coeur d'Alene to add to our campus needs.

The thing that I think you could be rather certain of

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is that if it were necessary to pass a bond issue to expand the plant at the present site, there would be a lot of people opposing that particular bond issue, which could jeopardize its success at the polls. It seems to us that the very logical solution to this is take the money, the next dollars that are available for the sewage treatment and the establishment of a plant, and to begin the new facility downstream as is proposed in Alternative E. Acquire the land, and design it so that it can be readily expanded in the future. Then, leave the plant in operation, and as the money becomes available in increments, continue to expand that plant as proposed under Alternative E until such time as you no longer need this plant and it becomes a pumping station sending that sewage to be treated up there to the plant further down the stream, and the other good part of that is that then you would already start bringing your lines in from the northern end of the City where the growth is taking place, and you would start bringing those main trunk lines into what will become the new main plant, and you would not go to all the expense of bringing those lines way down to the Fort Grounds area and involve all that investment of capital outlay only to eventually have to change it over to a plant further downstream. It seems very logical that there's a very good alternative to the proposal just to expand on the present site in accordance with Plan B.

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Thank you. That's all I want to say.

MR. MOCHNICK: Thank you very much.

Elton E. Bentley?

MR. BENTLEY: I think there's a question mark after that, I think I'll remain silent.

MR. MOCHNICK: Okay. Thank you very much. The other one with a question mark is George Gumprecht?

MR. GUMPRECHT: I'll wait for questions later.

MR. MOCHNICK: And Mr. McAdams?

MR. McADAMS: Mine are primarily questions as well.

MR. MOCHNICK: Okay. Is there anyone who had filled out a card and had checked the square that they did not want to make a presentation who have changed their mind?

(NO RESPONSE.)

All right. We can then proceed to the last stage of the public hearing, which is the question and answer period. I would ask that you would ask your questions through me to either Mr. Bain or Mr. Rushton. We're open for questions.

MR. JONES: My name is Ed Jones. I am a City Councilman, and I would like to know if Mr. Bain can give us the facts -- and I know we put smoke through the sewers -- if we were able to separate the storm sewers from the sanitary sewers, how much would that reduce our load on our plant presently?

MR. BAIN: Okay, let me go from memory, and then I can get specifics, if you like, from the report.

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There was a smoke testing program carried out last summer. In the Fort Grounds area we did do that type of testing, and in our evaluation of those flows from the sewers, we had this condition: We have a ten-inch pipe, which flows from the Fort Grounds area to the plant, and that's a bottle-neck. If we look at the flow to that pipe, we can normally get about eight-tenths of a million gallons, I believe is the figure, through that pipe unless there is surcharge which sometimes happens when water stands in the streets. So, you can get a surcharge of maybe five feet, and I think that will put about 1.1 million gallons into the plant. So, that's about how much you can get from the Fort Grounds under the worst of conditions, okay.

If you were to separate that, obviously, you could cut back a lot of that flow, certainly back down to something more normal like maybe a couple of tenths of a million gallons. So, it's probably worth something like .75 million gallons to the plant flow.

Now, when you look at the plant record -- well, just take last week. I just talked to the treatment plant operator about this kind of problem, asking him the questions I think you are suggesting is what did he see as the impact of some of the separation that's already occurred because you've done a little bit of it already because of work that was done a year or so ago. He thinks he does see a little improvement,

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but with a pretty good storm on the 13th of February, for example, and we did get a peak flow that reached, I think, 3.8 million gallons. The plant, when you are operating all the pumps, can get about 4.3 or 4.4 million gallons to it, okay. What's happening during the really severe storms, which have to be pretty severe, when they are severe you'll get what you can to the plant, but the Fort Grounds area, which can only get certain amounts through the sewer, will just overflow to the river and not get into the sewage treatment plant. So, the question that came up from the gentleman from Harbor Island isn't necessarily that there is waste that's coming from the treatment plant, it's waste that never even got to the treatment plant. It's of equal concern, but it's arriving by running off the flooded area. That's about what it's worth, about .75 million gallons.

Now, downtown you've got some roof drains that also are direct connections and you get a fair bit through them. Overall, now, though, when you look at a wet day like the 13th of -- Friday the 13th, I guess it was, we had about 2.4 million gallons through the plant even though we had a peak of 3.8. So, it tends to average out, and when you look at the data, we had a lot of days -- normally, even in a wet month, you don't average much over 2 million gallons a day, but during the really intense long rains you can get up to four that I talked about, but if you corrected all the Fort Grounds, you

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wouldn't bring that four down to two. You'll bring it down to 3.2, maybe.

MR. JONES: What about the, say, downtown and the other

MR. BAIN: The downtown area, if I recall right, is worth another approximately .75 million gallons. Let me check that for you. I just don't like to be too flippant about that number. I had just studied the one on the Fort Grounds, so I recall it.

MR. JONES: We have been turned down on the grant twice.

MR. BAIN: I understand, and from what I heard on television, there might not be a EDA anymore.

Well, I'll have to just go through this and perhaps I can answer your question in a little bit. I'll just study this and find the answer.

MR. MOCHNICK: Sir?

MR. GUMPRECHT: Donald Gumprecht, a Coeur d'Alene resident.

What you're saying, then, is that the reason for raw sewage overflow into the Spokane River is primarily the bottleneck, and that you don't necessarily have to go through the processes of separating sewers to prevent that; is that what you are saying?

MR. BAIN: Well, you either have to separate them to what the present course is or provide for flow, relieve the bottleneck and get that flow to the plant, and unfortunately

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the plant can't take much more, so you have to do one or the other. If you take more flow to the plant, it worsens our problem with the plant, so I would encourage the City to continue on their course to separate the waste because that will solve the problem for the down river people and for the Fort Ground people not to experience that flooding, and also keep a little more flow out of the plant.

The problem is funding that, and the City had trouble getting grants for that work, which is, I think, estimated at about three quarters of a million dollars.

MR. MOCHNICK: Are there any other questions, sir?

MR. McADAMS: My name is Gene McAdams. I'm employed by the City of Coeur d'Alene.

I'm interested in the archaeological considerations, first, in relation to Alternative E, which is the downstream site or the new site that was selected by the City Council and by the Citizen's Advisory Committee. The environmental engineers indicated that two sites could involve archaeological considerations. Those archaeological considerations are primarily Indian burial grounds or possible Indian relic areas -- or I don't know what the description is, but what I'm interested specifically in is this: If that is suspected, if that is a fact and it bears out as a fact, how does the City mitigate that and build upon one of those sites?

MR. MOCHNICK: Maybe I'll start off and answer that

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question, and Mike can add some things.

As a result of the Historic Preservation Act, there are regulations that have been prepared by the Advisory Council on Historic Preservation, and it details out what Federal agencies have to do prior to giving a permit or giving money or some action that would cause an impact on either an historic site or a cultural site. In this case, what we have done is we have had to contact the Idaho State Historic Preservation Office and to ask them if there have been surveys of the area. If there have been surveys, what have they found. If not, then the City would be required to do a detail extensive survey as part of their whole grant application. It's easier to take a site if there -- if we're talking about a cultural resource, and if you have an historic building, it's very difficult. What normally happens is it's up to the city, the state, and the EPA to come to agreement on the mitigation measure that can be taken to excavating the site. Sites can be taken, but quite often one of the mitigation measures is an agreement to allow a professional archaeologist to come to the site and go through the excavated material. The extent of that, we don't know because we don't know the level of detail of any of those sites, but to be fair and honest with you, that can be an expensive process given the way that archaeologist -- I think it depends on what kind of site they have to go about excavating the material. Sometimes

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when they look at it, they just simply like to register what it was, where it was, and they don't need to go into it. It sometimes provides -- and this is my interpretation, I'm not an historian or archaeologist, but I think it sometimes provides the same type of cultural resources that they have, and they don't go into the expense of excavating.

So, I don't know if that answers your question, but that would be the process that would be remained if -- when a site is selected, a survey would have to be done if not already done, and then, mitigation worked out with the State on how that site would be taken.

MR. McADAMS: Okay, then, that site, then, or those sites, I presume that work is grant eligible; is that correct?

MR. MOCHNICK: Yes, it is.

MR. McADAMS: I presûme that there are no alternatives to handling it other than through that process. In other words, if we had an extremely adverse situation as an example, and the Federal government was not going to fund an appreciable portion to the wastewater treatment plant, and the City took it upon itself to build the plant, I presume that if the City expected State and Federal participation that it would be necessary to fully mitigate the archaeological concerns according to the process that you've defined?

MR. MOCHNICK: That's correct. If it's a private venture that does not require certain Federal funds, none of

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those requirements need be met. I don't know whether you locally have some requirements to be met, but it's quite often brought up as an unfair technique when a developer can build on a site and a Federal project finds itself in much difficulty in getting project going.

MR. McADAMS: And I didn't ask the question for you to respond or assume responsibility for State funds, either.

I would like to ask this then: In terms of archaeological considerations, I understand from the Draft Environmental Impact Statement that there was no problem at Alternative B, and then when I listened to the description a little bit earlier, I surmised that there might be. I'm interested in a specific answer. Is that an issue with Alternative B; that's the alternative that expanded at the plant at the present site.

MR. RUSHTON: That's the primary area which is Alternative B. That's an identified registered site in that area.

MR. McADAMS: So, therefore, we would probably assume, then -- speaking from the historic preservation or archaeological point of view, that Alternative B would be more difficult to mitigate than Alternative E, or if it's about the same, say so, but I'm trying to weigh a degree here between the two alternatives.

MR. RUSHTON: I think that would depend on work that

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you'd have to do after deciding on a site. That site is already identified. There may be similar resources, that's what the archaeologists believe. There may be similar resources that would be unearthed in the ground at the site of E, but you wouldn't really know that until somebody comes back and actually digs some test excavations.

MR. MOCHNICK: Are we saying that the area where the gravel pit is, that is --

MR. RUSHTON: They did say that specifically that the gravel pit site of E, which has already been disturbed, obviously, and is now a hole in the ground would not have any remaining resources, but the two undeveloped sites that were part of E are relatively undisturbed land and may contain resources similar to what they know is in the area of Alternative B.

MR. McADAMS: I was under the false assumption that with all of the activity that had taken place with the railroad, with the construction of the present plant, and the adjoining property around there that that property at Alternative B had been pretty well scratched over -- if you will -- by now, but that's not the case as far as you are concerned?

MR. RUSHTON: That wasn't the archaeologists' opinion. Their opinion was that it was still a significant resource, there could be a significant resource.

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MR. McADAMS: Okay.

MR. MOCHNICK: We will take Mayor Johnston.

MR. JOHNSTON: Don Johnston, Mayor of Coeur d'Alene.

With regard to this, what I was concerned about, Roger, is: Are we able to challenge whoever it was that identified that as an archaeological site? I'm -- being a life-long native, I'm not convinced that there is a problem there, and I agree that it's been scraped over enough that it just amazing to me that -- and as I read this report, some guy from Texas made the determination. I don't understand. Would we be able to challenge that determination that that is an archaeological site?

MR. MOCHNICK: Yes, I'm sure that you can challenge that. The eventual challenge, I suppose, would go to the Idaho State Historic Preservation Office. However, I don't want to make it sound as if there are -- you know, great delays and lots of people out digging up that site to find all the archaeological resources. We quite often have archaeological resources in many of our projects simply by their location next to the waterways. They are usually not a problem. We have been able to work on a grant condition where the City allows, as I say, an archaeologist -- or sometimes as the construction is going on with the site, if something is uncovered they will call the archaeologist who the State recommends one for you that you can use, and he will be able to come down and take a

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look at it and see what it is, and only if it was something -- I think rare or unusual circumstances would they actually stop construction. And I would say in our region, I don't know of anywhere we have stopped construction because of an archaeological site. We have had problems, as I said, with historic buildings, but that's a whole other story.

Maybe -- Roger Tinkey is here from the State of Idaho. I don't know how closely you work with the State Historic Preservation officer. Do you have anything to add to that?

MR. TINKEY: I can't recall where we've ever stopped construction on a job as a result of that.

MR. McADAMS: One final question is: Is contesting these kinds of things -- I presume the City takes it on itself or does -- do our State and Federal friends -- or Federal friends help us with the cost of those expensive kinds of projects?

MR. MOCHNICK: Okay, that's a complicated question. I don't know whether I understood it. Take on the cost of it?

MR. McADAMS: In other words, as the Mayor said -- let's just make a statement: We challenge the efficacy of the archaeologist's report. All right. And we want to proceed with that challenge. Is that cause grant eligible?

MR. MOCHNICK: I would say no. That is not grant eligible. In the way of helping you, I suppose it would depend on the challenge -- it would depend on what kind of

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data you have in the way of your challenge. Again, I don't know that it would be that big of a problem, but it could be something that's faced later.

Warren McFall, who is also in the audience, is the EPA's Project Engineer on this, and is out of the EPA's Boise office.

Warren, do you have something to add?

MR. McFALL: I was just going to say regarding the difficulty in mitigating the archaeological aspect of it, we do have some recent experience down in the area where there was identified an Indian burial ground in the riverbed where they were supposed to build a treatment plant. The mitigation measures there were merely to have an archaeologist on the site during the construction period and during the excavation period. It wasn't a long complicated drawn out affair, it was a matter of just having an archaeologist there.

Yes, it did cost some money. I think the cost of having him there was something in the neighborhood of eight or ten thousand dollars during the period of construction.

MR. MOCHNICK: He was physically there?

MR. McFALL: He was physically there during all construction, and the project hasn't been completed yet, and as far as I know nothing has been uncovered yet.

MR. MOCHNICK: Okay, I believe Dick has an answer to the earlier question.

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MR. BAIN: Regarding the question about roof tops in the downtown area and the amount of flow attributable to the rain water that might get into the sewer system from roof drains and other related connections, there is about 250,000 square feet of roof area down there that we were able to confirm is connected to the sanitary sewer. It might be a little higher figure because at the time we were doing this some of them were plugged from volcanic ash. We estimate somewhere between 600,000 and 900,000 gallons per day. That would be about 750,000 gallons --

MR. JONES: So, we would have one and a half million gallons, then, we could cut down?

MR. BAIN: From those two sources, at least, yes. From those two sources -- as far as extraneous winter flow.

MR. JONES: Which is what we're --

MR. BAIN: You're concerned about that, certainly.

MR. JONES: In restricted financing, it's something worth looking at.

MR. GUMPRECHT: Why aren't the roof tops connected?

MR. BAIN: The roof tops from decisions years ago, many of the roof top drains are connected not to a storm sewer, but to the sanitary sewer. It's an artifact of history. It's -- it wouldn't be present code.

MR. GUMPRECHT: Correct me if I'm wrong. A year ago we were discussing a Federal grant to rectify some of our

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difficulties, and that grant involved tearing up streets in the Fort Grounds area, to which I'm opposed or at least I'd like to see a minimized impact in that regard, and there are two problems. One is the water flow, and the other was the raw sewage, so from what I've heard tonight, it sounds like if private building owners were able to alter their connections we would save as much water overflow as was proposed for the Federal grant last year by tearing up the streets in the Fort Grounds. If you're saying it's going to save .9 million gallons, that's the same as the Fort Grounds, roughly, and if we just increase the width of the pipe from ten inches, then we save that raw sewage.

MR. BAIN: Let me go through that kind of carefully because I don't fully agree with everything you said.

What I said was: There's about -- we'll use the high figure. We'll use the 900,000 gallon figure as what would come from roof drains into the sanitary sewer destined to eventually get to the sewage treatment plant. If that were removed from -- the roof drain connections were moved, it would go into a storm sewer which would get eventually into the lake. Now, when we use the figure of say 750,000 gallons that I was attributing from the Fort Grounds, that's the amount that -- because of the bottleneck, the amount of total storm water flow in the Fort Grounds which contributes to the flooding would be a larger figure. I'm saying a lot of that doesn't

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ever get to the plant. Now, if you make the pipe bigger so that it can, that aggrevates the plant problem, and, in fact, in several ways.

MR. GUMPRECHT: You don't have any estimate of what that would be?

MR. BAIN: Well, we have an estimation for the separation at the Fort Ground of being on the order of $750,000. That's separation at the present --

MR. GUMPRECHT: I'm talking about volume, not dollars.

MR. BAIN: Oh, the total volume of storm water in the Fort Grounds? I don't, but, Jim, if you did any work on that storm drain you're more directly connected with that. Is that a fair question for you?

MR. KIMBALL: Well, we calculated at one time a peak hydraulic run-off of -- I think we sized the pump for around 10,000 gallons per minute, and you can run that out, and that's a lot of water.

MR. BAIN: A lot more than what we were talking about going through that ten-inch pipe?

MR. KIMBALL: Yes, you bet.

MR. MOCHNICK: Do we have some other questions?

3 MR. McADAMS: Yes, I have another. In relation to a statement made on Page 57 of the Draft Environmental Impact Statement, one can interpret the continuation -- it's under the section "Continuation of Ongoing Studies". It says that,

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3 "The State of Washington waste allocation study should establish specific loading limits for the Spokane River upstream of the Idaho/Washington state line."

I think that Mr. Koep earlier described his understanding of the situation in terms of the Rathdrum aquifer which is sole source designated now, and we are very concerned that Washington not establish or unduly influence the National Pollution Discharge Elimination System Permit requirements, and we are also concerned because as Mr. Koep said, it appears that the controls are very stringent in this part of the country and there's much, much less control across the state line, and I'm interested in any comments that you might have in relation to equivalency, if you will, in terms of the degree of treatment required in Coeur d'Alene versus the Spokane Valley.

MR. MOCHNICK: Okay, I cannot answer that question. I will start out, and maybe some other people will offer some assistance.

I think that we at EPA have heard your concerns and realize that all concerns you have are based on the allocation study that is presently being done. I understand that there has not been, at least in the City's point of view, there has not been good coordination at this point with the Department of Ecology in Washington on this study. EPA has, I think, committed itself to Mayor Johnston to try to coordinate better

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the roles of the Waste Allocation Study, and I know that that is one of the things that we will be doing to make sure that specifically the City of Coeur d'Alene has some involvement as far as where this Waste Load Allocation Study is and where it's going.

As far as the treatment levels and requirements, the Waste Load Allocation Study is not completed yet, at least that's my understanding. We will be looking for some numbers, I think, out in the next month or so. I believe those are even draft numbers. I don't know what it's going to say.

MR. McADAMS: Well, what I'm really trying to indicate to you is that the Mayor and the City Council has never indicated anything other than assuming their fair share of the load, but I do believe that they had legitimate concern when we read these statements, and because it can be interpreted in a number of ways, and then when we are advised by some of our local developers, for example, that in order to continue with their occupation the only opportunity that they have -- well, I should rephrase that: The best opportunity that they have is to expand their operations in the State of Washington, and I just think that that's a problem.

MR. MOCHNICK: Okay, I think we have heard that comment, and I think that EPA will be working with you to try to rectify some of that problem and get information back to you, and I don't know if anyone has anything to add to that.

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Warren or Roger?

MR. McFALL: Well, not perhaps on the growth issue, but as far as the Waste Load Allocation Study, I think it should be pointed out that although Washington is conducting the study, it's being conducted through Washington funds primarily. The study is not strictly Washington telling Idaho what's going to be acceptable to the river. There's going to be information that's going to be collected during the study which will be utilized by our agency, and as far as I can see, it's an interstate situation, and Washington doesn't really have the authority to tell Idaho what it can discharge, and so our agency, EPA, is going to have to get involved and negotiate these waste load allocations with both states, but maybe this -- you're getting carried on by the fact that it's called the Washington Wastewater Load Allocation Study or Spokane River Allocation Study by the Department of Ecology, but we really suspect that information will be used by our agency to work with both Idaho and Washington to negotiate out the actual allocations.

MR. GUMPRECHT: As a citizen, I'd like to amplify what the Mayor and Mr. Koep and Mr. McAdams said, and that is seems ridiculous to be talking to Federal officials here if we're talking about such discrepancies across the state line because the whole point of having a Federal agency, it seems to me, is to take care of a problem that is apparently a common problem

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state to state, and it's absolutely preposterous that you can come up here as Federal officials and tell us that you don't have an answer on what's going on over there, and you don't have any ready answer for the questions, and that you don't have any well worked-out plan of coordinating things. The whole point there being a Federal agency is to smooth things out in situations that are between states.

MR. MOCHNICK: And I would agree, and when I said I didn't have an answer, what I meant was we don't know what the Waste Allocation Study is saying, and I think Mr. McAdams' question was dealing more with the treatment level --

MR. GUMPRECHT: But it sounds like you don't really have a way of coordinating things right now.

MR. MOCHNICK: Well, I'm not the person probably to ask. I'm not involved with the Waste Load Allocation Study, I'm involved with EIS on the Coeur d'Alene wastewater treatment plant. There are people in EPA, in fact, who are on the review committee of that Waste Load Allocation Study, and it's my understanding that there has been some coordination with the State of Idaho in the Waste Load Allocation Study. I don't know that there has been any coordination with the City of Coeur d'Alene, if Mr. Tinkey can add to that and tell us what's going on with the State of Idaho with the Waste Load Allocation Study. I do not know if they have contacted the City of Coeur d'Alene, but I imagine the State has worked with them.

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MR. TINKEY: Well, the first phase of the Waste Load Allocation is for an assessment of the river and the impact on Long Lake. The second phase that hasn't been started yet will be to work out various methods for allocating the waste loads. That hasn't even really started yet.

MR. GUMPRECHT: Yes, but there's been a clamp placed on sewage hook-ups in this area.

MR. MOCHNICK: Not because of the Waste Load Allocation Study?

MR. JONES: What I think he's getting at is in our area there is a clamp, unless you have five acres you don't put down a septic tank over the aquifer. In Spokane Valley there is no such clamp that I know of. In fact, the Spokesman Review spoke to it, and said they ought to do something, but nobody is, and we get blamed for it and they're doing it. That's what we're getting at.

MR. WELLS: My name is Tom Wells, I'm an employee with the City of Coeur d'Alene.

Several weeks ago I attended a meeting in Washington -- or in Spokane of that waste load allocation rule. At that meeting the State of Washington -- and what was of even more concern to me was the City of Spokane were directly discussing how to allocate waste loads, and were talking about what Idaho and Coeur d'Alene in particular would be allowed to discharge to the river. So, I think the City's concern is that not only

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that we be kept informed of what's happening, but that we be given the same opportunity to participate that the City of Spokane has.

MR. MOCHNICK: I would agree.

MR. ~~MORRIS~~ Morse: My name is Ed ~~Morris~~ Morse, and I'm a resident of Coeur d'Alene.

I would certainly agree with everything that Tom Wells just said, and I think over about the past year I've served on a 201 Study Committee for the City of Coeur d'Alene. At different times we were led to believe that at least the assessment for discharge into the Spokane River and the Waste Load Allocation Study had been completed, and perhaps some discharge criteria or some guidelines had been drawn up, and I think maybe Boise had a lot of input into that, and maybe the EPA did, and maybe the Department of Ecology, and the City of Spokane, but it doesn't take a real smart individual to look at a map and see that the people that are impacted directly, and the people that really have a vested interest and the people that live along that river where it's behind the dam are the people from Coeur d'Alene down to Post Falls dam. Those are the people that should be involved in that Waste Load Allocation Study. They should be -- they should have an input, they should have the input into the design criteria, and to the best of my knowledge those people have had no input whatsoever. It's kind of a farce to let

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Washington draw up a Waste Load Allocation Study and tell Coeur d'Alene and Idaho what it is or to let some Boise officials have a little bit of input into it, and then we have to live with it. So, I would certainly encourage you people, first of all, go back and sidetrack that study and reassess some of your conclusions in view of that, realizing the very limited data input that you have.

MR. MOCHNICK: May I ask you a question? What conclusions did you find that EPA is using as a result of that Waste Load Allocation Study?

MR. ~~MORRIS~~ Morse: Well, I think some of the discharge criteria for the sewer plant are based upon discharge levels arrived at under the Waste Load Allocation Study.

MR. MOCHNICK: Okay, the Waste Load Allocation Study, however, is not completed, and I would say that at this point that the numbers that have come out were -- could be estimates in the State of Idaho and have not been based on that, but I agree with you on your other concerns as far as the impact it could have and the need certainly for coordination with the State of Washington.

MR. ~~MORRIS~~ Morse: Well, then, I think many of us have been lead to believe that there are at least some discharge criteria that are guidelires because where we originally started out with the design for a sewer plant was: What is our discharge criteria? And we asked the EPA, and we couldn't

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get a definite answer; and we asked the State of Idaho, and we couldn't get a definite answer; and I think that probably the last meeting that we had we found out that we've got some rough guidelines, and some parameters to work within as those criteria seem to be changing now in view of the budgetary and monetary constraints which I don't think is necessarily a good policy. That means if you've got money, then you design for the most stringent criteria, and if you don't have the money, then, gosh, what can you do for us? Why don't we sit down and find out what we really need in terms of discharge criteria, and only make the people of Coeur d'Alene build to those standards and let's quit trying to fool somebody. Let's lay all the cards out on the table, and nobody's willing to do that with the City of Coeur d'Alene. They want them to build a new plant, but they don't want to give them any discharge criteria or involve them in that discharge criteria or involve them in a Waste Load Allocation Study.

MR. MOCHNICK: Okay, Dick, would you like to speak to that?

MR. BAIN: I'll just read the record. We did -- as a facility planning engineers and discussed this with the Citizen's Committee -- received guidance on February 13, 1980 from the State of Idaho, Division of Environment, and in a meeting which was also attended by EPA, these facts: "The total phosphorus limitations based on the present State of

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Washington policy for the Spokane River which requires 85 per cent removal of total phosphorus for discharges over one million gallons per day, the policy has been established to reduce putrefaction problems in Long Lake below the City of Spokane. When the joint Washington, EPA, and Idaho Waste Load Allocation Study is completed, the State of Idaho will be expected to control their phosphorus sources of which Post Falls and Coeur d'Alene are the most significant."

That written statement, which was provided to us and to the Committee at that time, was reiterated later by EPA, Region 10 in a letter dated August 6, 1980. So, I think it's a matter of record that we've had that kind of guidance, and it has been limited to the Waste Load Allocation Study.

MR. GUMPRECHT: But that's exactly my point. You still haven't involved Coeur d'Alene in those studies. However, you've told them that: By the way, the State is involved, and EPA and the Department of Ecology in Washington are going to draw up these standards, but they are not involving anybody else in them, and no input as to what they are. Yet, I agree. You've told the City and you've told the citizens: You are going to be held to those standards. And you've given nobody input into drawing up those standards. You've merely told them that they are going to be held to the Department of Ecology standards in Washington.

MR. MOCHNICK: Do we have some other questions?

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MR. McADAMS: Gene McAdams, again.

This is related obliquely to environmental considerations, I believe, but the philosophy that we've been operating on here in the City is that -- it's been in the Federal registry, and I haven't read it for the last couple of years, but I think that the intent of Public Law No. 92-500, however, was to improve the quality of the water in the streams in the country, et cetera, et cetera, et cetera. The intent of that legislation also required that any grant that was to be received by any community would be for all practical purposes a one-time grant. In other words, the local community would get the project together, they would build it, and then after it was built would assess an adequate monthly service charge or some form of generating money to guarantee that the future rebuilding of that plant would be built with the community resources and without accessing the Federal government. We've been building under the assumption that the grant that would be allocated for all practical purposes to the City of Coeur d'Alene would be a one-time grant, and, of course, when we talked about 75 per cent Federal money, 15 per cent State money, the objectives of the Mayor and the Council has been to build the best plant possible that will last for the long term, that could be added to flexible -- et cetera, et cetera, et cetera.

When we started out, the first phase of the project

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for the selected alternative, which is Alternative E, was a 4.2 million-gallons-per-day plant at a cost of -- gross cost of just under $15 million. We were advised because the United States Congress was not able -- for a variety of reasons -- to provide sufficient funds to the State of Idaho so this project could be funded, that we would be required to build a 2.1 MGD plant. Our estimated cost of that was about 11 million. We're now advised that -- and only speaking now not to growth cost, but to the Federal participation of the project, we've been informed that's in the neighborhood of 3.27 million for the Federal government's 75 per cent share. I think in the consideration of this project, and in relation to the consideration of archaeological environmental impacts, it's very relevant to know specifically if any grant given the City of Coeur d'Alene at this time will be considered a one-time grant or if it's funded at this reduced level if it will be considered as a temporary fix, and whether or not the City will be entitled to start over again at a future date because of today's funding shortages.

MR. MOCHNICK: I'd like to have Mr. McFall respond to that or Mr. Tinkey.

MR. McFALL: Well, the one-time nature that you question, if it turns out that the funds aren't available, there's nothing that EPA can do about it. The only thing we can do is take the funds that are allocated to Idaho, let Idaho

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designate which cities are going to get the funds for the particular year in question, and then go through the administrative processes of allocating these -- or obligating those grants to those communities, and at the current time you're talking about $3.2 million. I think you're talking about 1982 money. 1982 money hasn't been authorized by Congress. 1981 money is currently available, and we're talking about, I think, the project priority list for the City of Coeur d'Alene has something like $800,000 on there for design money, Step 2 money. So, anything beyond -- well, let me draw a precaution there because we've heard some rumblings that there may be some constraints placed on FY '81 money, and further constraints on FY '82 to the extent that there may be no FY '82 money at all. So, when you say, you know, is this going to be a one-time grant, well, I think in light of today's political and economic climate, you know, whatever comes down the road, we can't promise anything beyond that, and we hope that what's on the priority list will be available when you are ready to use it. I don't know how we can say anything much beyond --

MR. McADAMS: Warren, I recognize that, but as far as we are concerned, the project that's under consideration now is a -- if you will -- a Band-Aid expansion, possibly at the present site, and I don't know what that entails, but I'm concerned that the City has one nickel to spend, for example,

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and if we're only funded one time, and if that one-time nickel expenditure is going to be the Federal entitlement for evermore, one alternative that could be considered, perhaps, is to do nothing until such time as the discharge permit requirements are lessened. Until such time as more funding is available or until such time the pressure gets so great or you've re-evaluated the sole source designation on the Rathdrum aquifer, that you will allow a development here similar to that that allegedly is taking place in Washington.

MR. McFALL: Those are all good concerns, and all good possibilities. I mean, you could consider all those.

MR. McADAMS: I can remember when I used to go to the store with my nickel and I was very careful as to what I was going to spend it for because that's all I was going to get that week.

MR. McFALL: I think as we discussed before, I think that's a very important part, I think. You know, it's one thing that when we're talking about not an unlimited source of funds, but certainly a solid source of funds, and we can look ahead for the 20-year project life, and we can plan for 20 years down the road and be relatively assured that the funds will be forthcoming if we stage this project five years at a time or whatever it might be. But we're suggesting here looking at a very risky situation from the funding standpoint, and I think your idea about looking at what you can buy with

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that nickel is the way to go. I think you have to look at the increment which you can buy for that amount of funds, and if all you get is a small amount of money put aside to build a facility, then I think it behooves you -- it behooves all of us as public officials to assure that the project constructed is the most project for the least amount of money.

MR. McADAMS: All I want said is simply this: That the project contemplated is temporary, and it wouldn't take our nickel.

MR. McFALL: Are you trying to qualify your project as a temporary project? I don't understand.

MR. MOCHNICK: Could we have one person at a time, please.

Warren, do you want to --

MR. McFALL: I was trying to understand Mr. McAdams' question with regard to the temporary nature of --

MR. McADAMS: I'll expand that a little bit. I think from my viewpoint that Alternative B is in an area of the City that will have demands upon it to expand. You've already heard from North Idaho College, their proposal for development there, their plans to move some of the manufacturing operations from that area. I believe that the Citizen's Advisory Committee and the City Council have gone on record and have stated that the most desirable permanent site is Alternative E, that is, down river. And what I'm trying to say is that

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from my viewpoint, based upon what I know now, I look at that alternative as a permanent long-term most desirable solution, and I'm -- I think that it's been established that the present plant has suffered from aging, and I think that it's been established that there are some improvements that will have to be made, and I would just hate to see the City in a position to be forever out of -- or forever prohibited from moving on to that next site for Federal help.

MR. MOCHNICK: Could we make this short, Warren?

MR. McFALL: I think I understand your question (speaking to Mr. McAdams). I'd like to respond by a different way and maybe suggest that Dick comment on it because what you're asking is whether or not the expansion at the existing site, whether that is in fact a technically feasible good engineering solution, and I've found nothing in the facility plan that would indicate that expanding at the existing site, although socially it has some problems, I understand that, and there's some environmental problems, too. Particularly, though, I don't find anything that would indicate that you can't build a 20-year solution at the existing site.

MR. MOCHNICK: Thank you. We need to take a break so the court reporter can change her paper. Could we just take about a 10-minute break and then we will return.

(WHEREUPON A RECESS WAS TAKEN AT 9:10 P.M.)

MR. MOCHNICK: We will please come to order. We will

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reconvene the meeting at 9:21 p.m. We will continue with our question and answer section, but before we do, one quick announcement: For those of you who have not read the EIS -- most of you seem to be very familiar with it -- there are some summary documents of the EIS up here at the front table, and if you'd like to have one of those, be sure to pick one up.

MR. BAIN: I have a carry-on question to take up where we'd left off. I want to rephrase Gene McAdams' question to you, Warren, and see if we can get an answer that I think is real. Basically, if the City were to take the existing site and do what I'll call a quick fix or a -- I don't want to use the term Band-Aid, but some sort of minimal improvement to get to capacity and was looking at that as an interim measure, and it had to go to another plant later, and they got grant money for this quick fix, could they, if the grant program cranks up again in a few years, is it possible for them to at least be considered for grant money in the future to move down river? I guess that's the essence of the question as I understood it.

MR. McADAMS: Yes. You did a better job.

MR. BAIN: Is it possible or are they administratively out?

MR. McFALL: I may have to ask some questions or do some supposing before I answer because it depends on whether or not that segment that's constructed meets the ultimate

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water quality standards of the effluent limitations. That's a key point. If the facility proposal does meet the requirements, the effluent requirements that ultimately developed for the area, then the answer is: Historically, we've never been prejudiced by -- you know, what's happened in the past, and what we fund in the past. What we historically do is when there's a need, we've walked down the road, say, five years, built a facility, it's now up to capacity, we start at that point in time and look forward and ask the community to look forward. Typically, if we use the same rules that we have now, it would be another 20 years, and so, they would look then at that point, they would probably go back and re-examine and update the costs on the alternatives. There may be some new alternatives that would be available, and they could go back and re-examine where they are and where they intend to go in the near future. So, if we get to that effluent limitation with that first phase, the way we have interpreted the rules up to now, I don't see any problem. It's not going to foreclose any future options, okay.

MR. MOCHNICK: Okay, thank you.

MR. JOHNSTON: Roger, if I could just add that our mode has been to go for the most cost effective, realizing that this is our one and last chance, and we are concerned that if we do anything now because of the reduced funding for any plant, that it might be considered that last shot, and we are

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concerned about that. And that's where we are coming from.

MR. McFALL: I would like to carry that on because I put that supposition in there that if it did make the effluent limitations that we wouldn't be prejudiced, but the other thing is, obviously: Well, what if it doesn't? Okay, what if your first piece of work just provides, let's say, secondary treatment for an additional growth increment, and the effluent limitations would be for something a little bit more stringent than secondary treatment, then in that case we would consider that increment -- that construction increment wouldn't be ~~needing~~ meeting the effluent limitations, and, therefore, it would be only a segment of the total facility, and in that case we would have to get a schedule for the remaining segment to bring it up to the water quality standards. We would need a schedule or basically a commitment from the City that those additional facilities would be constructed to bring the project up to a full operating treatment plant that would meet the water quality standards.

Does that complete the picture?

MR. JOHNSTON: Basically, yes, but you know, we've hired Brown and Caldwell to get us at that point in view of what you've said about FY '81 being even cut back, FY '82 possibly not even being. We've asked Brown and Caldwell to get us the best plant for the money that we could possibly

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attain, and I have recognized what you said, but I still say we have to also be assured that that isn't our last chance because for the last three years we've been marching toward that ultimate goal of what we both want, and that was the best and largest and most cost-effective plant that was attainable.

MR. McFALL: Okay, then I don't mean to step backward and change hats or change stories, but I guess I have to ask you a little more, then. I guess I thought you were saying you were changing your favorite alternative -- your favorite alternative was to expand at the existing site.

MR. JOHNSTON: No, Alternative E is still our ultimate goal, but we recognize that as unattainable.

MR. McFALL: In that case, I guess we will have some trouble because it wouldn't fit into the total picture of the two-year projections.

MR. JOHNSTON: That's why we've hired our consulting engineers. He is going to be working with the 201 Advisory Committee, and we hope that we can arrive at a solution with the money available that will speak to some program, which I don't know at this time. We hope that the Advisory Committee with the assistance of the consulting engineers can come up with this solution that is going to get us to the most cost-effective plant and the highest level of treatment available with the existing funds available.

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MR. MOCHNICK: We have someone who might want to add to this.

MR. THOMPSON: My name is Bruce Thompson, a resident of Coeur d'Alene.

Warren, I've got to ask you another question that's going to duplicate one you've just been asked, but I didn't understand your response. Let me put it this way: If the City does fix up the existing wastewater plant at the present site, and those repair jobs do raise the quality of the effluent, and it does meet the permit limitations say for the next five to ten years, my question is this -- it relates back to the one time only funding -- if the City does, in fact, meet the effluent limitations with the Band-Aiding, then I would say that EPA would not participate again in funding a plant at site E because those repairs are meeting the effluent limitations. Why would you come back in and fund it another time? I thought your answer was going to be: No, we won't fund it again since the fix-up does, in fact, meet the water quality standards for the river. But you said something different, and it confused me. What were you saying, in fact? Was it that or something else?

MR. McFALL: Well, if I can try to answer that: It may be that my answer is coming across slightly confused because I am thinking out loud now because this is a new area, but what -- I think the key thing that we've got to concentrate

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on is: What is the project that we are focusing on for the 20 years, okay? Our rules right now say that if we are to going to fund the project, you must specify what is the cost effective solution for this 20-year picture. Now, of that selected project, we can fund any increment of that, all right? We can fund it on incremental basis and funds being available, we can come back and fund the next increment. Now, if you determine that your selected alternative is Alternative E, then you want funding to build on Alternative B, then we've got a problem because then you're saying: Let's put Federal and State and local funds in other than the cost effective alternative.

Now, there's only one situation where I know that we can help you on that, and that is where we provide interim emergency-type funding, which we have done in the past, and I've never seen a project here in Idaho that's been funded under that, but we have provided emergency-type funding as a get-by solution, a Band-Aid solution -- that word has been used -- that just recognizes that there is some cost to just get you by, but I can't give you any guideline. If that's what you are proposing, then I can't answer your question.

MR. JOHNSTON: But you're asking us to commit to 20 years, and you're telling us you are not even going to commit one year.

MR. McFALL: I'm not asking you to commit to 20 years.

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You've instructed your engineer, he's using our guidelines; our guidelines say that if we are to provide funding for a project, it must be shown to be part of the 20-year package. I'm not saying that you need to commit for the full 20 years. I'm saying what you need to do is determine what alternative you are going to select based on looking at the alternatives over 20 years; not over two years, not over five years, but over 20 years, and then once you select that alternative, then let's start funding it in phases and stages, but if we select that one alternative we can't jump to another one and then fund that one. That's the problem we're having, you see. The only way we can do that is on an interim emergency-type basis.

MR. JOHNSTON: Can I finish up by just saying this: What I hear you saying is that you are not saying that if we -- because of the lack of funding -- take something on this year that that is our last shot?

MR. McFALL: Unless --

MR. JOHNSTON: Well, now you get another "unless" in there.

MR. McFALL: I'm saying what you want to do, if you want to fund the Alternative B, and if that is what you've selected for your 20-year alternative, I don't see any problem, but when you select Alternative E and then want to fund B, then we've got a problem.

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MR. MOCHNICK: May I ask a question, Warren? How about Alternative E under a phased situation? I think that's what the Mayor was saying.

MR. JOHNSTON: Well, except, Roger, I think I recognize that under Alternative E you can't build a new treatment plant, you can't put in a clarifier and let it sit there for five years until you get money to put in a trickling filter or whatever -- and here I'm getting in a technical area I don't know much about -- but you've got to build a whole plant. That's what I hear; is that correct?

MR. TINKEY: You should build an operable fraction.

MR. JOHNSTON: Well, I didn't understand that you could build operable fractions and have a working plant and meet the guidelines for the discharge permits and the rest. I didn't understand that that was available.

MR. McFALL: If you're talking about building a new plant at a new site, then you'd have to commit to an operable facility which would eventually take you through the effluent limitations, but you can build it in segments if you wanted. We have been told that we can award a grant on anything that you can write a contract for. Okay, so we can build it in as many segments as you want, but if we are talking about a segmented facility, you're going to have to -- in that case, there needs to be a commitment on meeting the effluent limitations. I can see your confusion.

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MR. MOCHNICK: We have another question. Sir?

MR. BENTLEY: I'm Elton Bentley, and I'm on the Citizen's Advisory Committee.

I'm interested in the term "operable fraction"; is that it? Could we consider Option B as an operable fraction of the total picture?

Now, I promised myself I wouldn't say anything tonight, but I think in more simpler terms, and I will have to admit that I get quite confused on some of this discussion here on what we can do and can't do. Could we consider the present site as a fraction of the total solution for our sewerage disposal problem?

MR. MOCHNICK: Warren, would you like to respond to that?

MR. McFALL: I think probably Dick Bain ought to answer that. I mean, really, because it's really a design question. It's a question that relates -- that your engineer should answer because if he's determined that the existing facility can fit into the total cost-effective alternative, then it can.

MR. BAIN: If you take it simplistically, and say Alternative E is our goal, Alternative E, by definition, does not involve any facility at the existing site. If you say Alternative E is our goal but we can't get there from here because of money, we want to someday, and meanwhile we've got

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an existing plant, let's make use of it and hope for the best in terms of two things: One, a grant program in the future; and two, some income from hook-ups. Then one way to get there is start raising some revenue and hoping for a grant program in which case some improvement in terms of capacity, now, at the existing site would allow you to stay in compliance, which is important to the City and the EPA, and allow you a way to provide some income to the City that we could net in a reserve fund for future expansion either there or some other place. And three, the hope that the grant program will come down back to life, and if it does, then they wouldn't then be barricaded from a future appeal to move down river and then abandon it. So, it's just an implimentation step. You could lay it out in a schedule, that's the only way to get there because there's no money, but if we are told that anything you do at the existing site is by definition a departure on another trail, then you are obviously shot down from a future grant, and that would worry the City.

If you've got to take some action, then, you don't have enough money to commit to a down river situation unless the City is willing to pass a rather large bond issue and commit to a future action without a grant, since they can't be served another grant.

MR. MOCHNICK: Mr. Tinkey?

MR. TINKEY: This would work in one way: We've been

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talking about whether you can dump money in the other solution, if we put a limited amount of funds into Alternative B, and it only bought you five years capacity, and at the end of the five years the grant program became available again and you used up your capacity, sure, you'd be eligible for new funding at the new site. Of course you would, because you'd be in need again. What EPA doesn't want to do is waste money building capacity just to abandon it.

MR. McFALL: Do you have anything to lose by telling yourselves that what you want to put your money in on now is the existing plant, and somewhere down the road we might change our mind, but to make sure that we have got a project that is compatible with the future needs -- if in fact the grant program isn't available -- and we don't get a lot of funding, do you have anything to lose by just saying: Well, let's say today that Alternative E looks like the best way to go, and for the 20-year haul we're going to go with Alternative B. Okay, do you have anything to lose from that standpoint? From our standpoint, if that's what -- and like Roger was saying -- if you build a five-year facility, it is fully operated and meets the effluent limitations, five years down the road you re-examine your alternative and decide: Well, although five years ago it looked like over the 20-year haul siting at this existing site was the way we wanted to go, but today we decided that, well, we want to -- I can see where,

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you know, you could change courses. But, see, our problem -- and I hate to throw a bunch of red tape here, but if you start funding something that is not the 20-year solution, we've got a problem. That isn't part of the 20-year solution.

MR. MOCHNICK: I think that we've probably discussed that one question, that we didn't have an answer for, at length. Let's move on to -- maybe Warren can get together -- and I'm sure we will be getting together with the City of Coeur d'Alene to discuss future grants, and certainly new alternatives and some other costs, and go into it then.

Do we have any other questions?

MR. SCHULER: I want to -- on the basis of this discussion, I want to re-emphasize again, though, the situation that the college is in. I hope that you are all aware that the replacement value of that college campus and the buildings on it is today well over $20 million. In other words, much more than what the plant was supposed to cost on site E. We have no alternative. With that kind of investment and commitment having already been made in that area, the State, the Federal government, the local taxpayers have all contributed to that development. Amortization schedule on the buildings is 50 or 75 years on the newest ones, so they are going to be a long-time there. I don't think that the State is going to be willing to commit on a second campus site to serve the students of this area in five northern counties.

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So, I guess what I'm saying is that I think we all have to keep in mind that that is the only place we have to grow. The Coeur d'Alene sewage plant today is effectively amortized, it's life expectancy has been lived out. They now have the alternative or the option to go to a different site and commit the millions of dollars that will be necessary to build another plant at that site. We don't have that option anymore because our funds have already been expended. So, I think we really have to look at Site E, and I can't emphasize that strongly enough.

MR. MOCHNICK: Okay, thank you.

MR. THOMPSON: I have a question for Mike. It deals with one of the recent impacts on the City with this project. It would seem to me that sometime ago, eight months, ten months, twelve months ago people in higher positions had to be aware of this funding crunch that was coming. It's not created all this consternation on this project, it's probably the most significant impact that we now have on the City, just the fact that the money is not there. I can't fathom or believe someone, some people, or some group didn't know a year ago at the time that we were approaching this problem now that we can't seem to deal with very effectively, and I don't know if anybody knew that a long-time ago or if they did, why the information didn't get to the Citizen's Committee or the engineers or someone because we all did go down a certain path

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assuming certain things would happen, and they didn't materialize, and here we are. And I just can't believe that we didn't -- someone didn't know that we were going to have this terrific funding crisis that's now upon us.

MR. MOCHNICK: Mr. Tinkey, would you like to respond to that?

MR. TINKEY: I just wanted to know who he voted for for President.

MR. THOMPSON: That's not answering my question.

MR. MOCHNICK: No, but as far as being in upper positions, I think we have found out -- tonight on the six o'clock show of President Reagan, I think all kinds of things will come out of that as far as funding goes. I don't know that EPA heard any rumor about funds months ago. We're hearing one that Warren mentioned a minute ago that there might not be any construction grant money. We don't know, and that's as a result of the last few days, that I started hearing that rumor, and I think that that will probably -- something like that could very well happen, and the next few days should tell us.

What I guess -- in answer to your question, yes, I think it can happen that overnight you may find funds, Federal funds disappearing, and that is not necessarily something that's known for many years down the road in advance of how a program is going.

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MR. BENTLEY: Elton Bentley, again.

I'd just like to change the formula from what we can do to what we can't do to simplify it a great deal, and just admit we can't continue to dump untreated sewage into the Spokane River, and then go on from there. That wouldn't be half as confusing to me as some of these things that we've been discussing, what we can do. We might go back to outhouses.

MR. MOCHNICK: Okay, do we have some other questions? Mayor Johnston.

5 MR. JOHNSTON: In the Environmental Impact Statement you have already addressed items based upon previous suppositions, Alternative E, B, G, the rest. Is this Environmental Impact Statement now going to readjust and speak to the issues that have been spoken here tonight and in effect reduce funding, is your Environmental Impact Statement going to respond to that so that we don't get down the road and get caught going through another environmental impact public hearing? Have I made that clear enough?

MR. MOCHNICK: I think so, and I'll try to answer the question.

There might be two points: One, will the final EIS reflect the new information that might come out of the new alternatives? Yes, the final EIS would do that. If a new alternative, however, is developed that the City is willing

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5 to select and EPA and the State is willing to fund, in other words, a good feasible reasonable alternative, a requirement for another public meeting certainly could be reasonable, and a meeting would have to be held so that that alternative and those costs can be given to the public, by virtue of the fact that at this point we have alternatives and costs that the public -- those ones which attended and came to find out about, the new alternatives that somebody might be talking about have not, in my knowledge, been costed out.

MR. JOHNSTON: Would your EIS comment on the fact that there's been a change in the ball game?

MR. MOCHNICK: Yes, sir, absolutely.

MR. JOHNSTON: And even possibly speak to maybe reducing regulations to meet the funding or whatever? I don't know that that's going to happen, but maybe there could be comment upon it.

MR. MOCHNICK: I would say yes to that.

Do we have any other questions?

MR. McADAMS: I want to ask one quick one, if I may.

Environmentally speaking, would it be better for the City in view of the size of the Spokane River to consider possibly two out falls in order to mitigate impact upon the river, the fish life, epitaph, that kind of thing? In other words, the Spokane River is not that gigantic a stream, and I'm wondering if that type of thought process would appear

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meritorious to particularly to environmental engineering?

MR. MOCHNICK: Do you want to respond to that, Mike?

MR. RUSHTON: Well, I'm not the water quality expert that worked on this report. I think that there are different environmental factors for the different choices. You are saying either having two separate discharge points or one, which is the best environmentally?

MR. McADAMS: With the same MGD and the same level of treatment.

MR. RUSHTON: Right. I think for the same water quality parameters the two sites would be obviously giving you better dilution situation than you'd have with one, and therefore, in the immediate areas of those out falls would have less of an impact than one large out fall, but in terms of other water quality situations, maybe further downstream, say the dissolved oxygen sites that they have up above Post Falls dam, I don't see how two locations that close together would have very much difference in that regard. So, there's different situations for different environmental parameters. Also, maybe the dilution provided by the two might be better for fish life than one large discharge, but it's hard to select overall which is the best.

MR. McADAMS: Well, what you said is that maybe depending upon the circumstances; is that what you're saying?

MR. MOCHNICK: I would think that's right, and I think

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that depends on the water body, it would certainly, and the location of those out falls and the amount of effluent being discharged, that would be a very good answer.

SPECTATOR: Did I understand correctly that if they adopted plant E as their ultimate goal but it's going to take awhile to get there that there's this kind of rare emergency grant that might be available to keep plant site B going until they got there because the City is already in a critical state? Did I understand that correct? Is that a possibility, and that wouldn't affect the grant for E?

MR. McFALL: Right. I don't have any personal experience on working with the project that's used that type of grant, but I understand it's been awarded before with other projects in Washington and Oregon.

Are you familiar with any of those, Roger?

MR. MOCHNICK: No, I'm not.

MR. McFALL: But I've heard interim temporary-type facilities recognized not to be pieces of the total project just to get them over the hill, I understand that has been done, but --

MR. MOCHNICK: We've funded interim solutions. I suppose maybe the one you might be talking about is the Bend, Oregon project. This is the one where we have funded an interim effluent disposal alternative and are now in the process -- or have been in the process of looking for the

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ultimate solution.

MR. McFALL: Even though that interim solution did not fit into the total -- you don't know?

MR. MOCHNICK: We don't know whether it will, but maybe -- Roger said earlier we have the interim process there. We have a treatment plant, but we did a study on effluent disposal, but it was not emergency funds, it was just something that was funded and will continue to be funded, I think, if it becomes part of the ultimate solution itself, then all becomes grant eligible. We are guessing.

SPECTATOR: Do you know if there was any conditions in there that if it had to be abandoned whether there'd have to be a pay-back or anything, a reduction?

MR. MOCHNICK: There was no condition --

MR. McFALL: We can't answer that.

SPECTATOR: It seems to me, though, that's an alternative that would be well worth looking at, the interim-solution-type thing to use for plant B.

MR. McFALL: I would expect, though, that we would be willing to go along with that if the cost were not a significant bunch, and don't try to pin me down on that, either, but it doesn't seem very prudent to spend a lot of money on an interim solution when you know in fact it's not going to be part of the total picture, but in the sake of the situation, you know, you can see where for a less significant

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amount of bucks it could work.

MR. BAIN: Is that something you could check on or do you know somebody we could talk to?

MR. McFALL: You could certainly check with Roy Ellerman.

MR. MOCHNICK: Okay, do we have any other questions.

MR. McADAMS: I want you to know that I could go on for another hour or two, but I think everybody is getting tired.

MR. MOCHNICK: Well, thank you very much for coming. I appreciate your comments and your questions. We will be responding to these in our final EIS.

I have one written record on a card from a Mrs. Ferrier that will be put into the record.

Thank you very much for coming. We are adjourned at 9:55 p.m.

(WHEREUPON THE HEARING ADJOURNED AT 9:55 P.M.)

HESTON and HOWELL
REPORTING SERVICE

CERTIFICATE

STATE OF IDAHO)
) ss
COUNTY OF KOOTENAI)

I, CHARLOTTE R. CROUCH, the undersigned Certified Shorthand Reporter, hereby certify that I took in stenograph and thereafter transcribed into the foregoing record the proceedings in the within entitled cause, and that the said transcript is a full, true and correct copy of the proceedings had in the above-entitled cause held at Coeur d'Alene, on the 18th day of February, 1981.

DATED This 6th day of March, 1981.

Charlotte R. Crouch
CHARLOTTE R. CROUCH
Certified Shorthand Reporter

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Response to Comments Received at the Public Hearing on the Coeur d'Alene Draft EIS, February 18, 1981

1. EPA has participated in the funding of 201 (wastewater facilities planning) and 208 (nonpoint source pollution control) studies on both the Idaho and Washington sides of the Spokane Valley-Rathdrum Prairie Aquifer. Both of the 208 studies concluded that sewering of urbanized areas and restrictions on proliferation of on-site waste disposal systems over the aquifer were desirable. EPA and other federal agencies have encouraged implementation of strategies to achieve these goals.

   While EPA has helped to fund the aquifer protection planning, it is not responsible for implementation of protection strategies. In Idaho, the Panhandle Health District has been given that responsibility and has established policies that are effectively restricting the proliferation of on-site waste disposal over the aquifer. In Washington, a special 208 management program has been established in the County Public Works Department. While the 208 plan has been completed and a series of aquifer protection policies have been developed, an implementing agency has not yet been established. EPA has requested that the Spokane County Board of County Commissioners act as lead in this effort until one or more agencies officially accept the responsibility. In the meantime, EPA has urged local planning agencies to use the 208 plan findings to develop more restrictive controls on residential, commercial and industrial development in unsewered portions of the Spokane Valley.

2. Refer to Mr. Bain's statements beginning on page 29 of the public hearing transcript for a clarification of the untreated sewage overflow situation in the Fort Grounds area. EPA placed a Compliance Order on the City of Coeur d'Alene in March 1979 so that the untreated discharge would be rectified. The Coeur d'Alene facility planning process was conducted to identify ways of correcting this hydraulic overload situation. The City is planning to begin wastewater facilities improvements in the near future; construction is expected to begin in the spring of 1982.

3. The Spokane River waste load allocation study is being conducted by the Washington Department of Ecology, partially in response to a court ruling regarding the Liberty Lake wastewater facilities plan. The first phase of this study, conducted by URS Company, has

been completed. The first phase was primarily a data compilation effort designed to identify sources of pollutants in the Spokane River and maximum acceptable loadings of pollutants to Long Lake.

The Phase 1 report also included a method for allocating phosphorus loads to the various source categories identified in the data collection effort. An example phosphorus allocation was made for the Spokane area wastewater treatment facilities after making various assumptions regarding inputs from the Idaho wastewater sources.

This waste load study is being conducted by the Washington Department of Ecology to aid them in establishing effluent limitations for Spokane area wastewater treatment plants; these NPDES limits are reviewed and approved by EPA. The State of Washington cannot dictate NPDES permit conditions in the State of Idaho. EPA has closely followed and participated in technical review of the waste load allocation effort in Washington. The information generated there is being used along with water quality data collected in the Idaho section of the Spokane River to establish NPDES permit requirements in Idaho.

Effluent limits must respond to localized water quality conditions as well as basinwide water quality goals; therefore, effluent limits may vary from one stretch of river to the next. Dischargers in the State of Idaho, however, are not being required to meet stricter waste discharge limits than treatment plants discharging to the Spokane River further downstream.

4. The interim improvements described in the Coeur d'Alene facilities plan are the initial phase of the preferred alternative, B1. This alternative has been proposed as the 20-year solution to Coeur d'Alene's wastewater treatment needs. EPA is now funding the interim improvements because they are a part of the selected 20-year solution. As funds become available, EPA will accept grant applications for the additional phases of the selected alternative. If Coeur d'Alene proceeds with the interim improvements and at a later date decides to pursue a wastewater solution that is not a part of the approved facilities plan, grant applications for this new course of action would likely be denied.

5. This Final EIS discusses the implications of a revised Alternative B (B1). It has been determined that neither a Supplemental EIS nor an additional public hearing are necessary to address the plan changes that have been made.

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ACRONYMS AND ABBREVIATIONS

BOD - biochemical oxygen demand

DO - dissolved oxygen

EIS - Environmental Impact Statement

EPA - U. S. Environmental Protection Agency

FNSI - Finding of No Significant Impact

IDHW - Idaho Department of Health and Welfare

MCL - maximum contaminant level

mgd - million gallons per day

NEPA - National Environmental Policy Act

NPDES - National Pollutant Discharge Elimination System

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Appendix B

CULTURAL RESOURCES CORRESPONDENCE

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(86-90)

IDAHO STATE HISTORICAL SOCIETY
610 NORTH JULIA DAVIS DRIVE BOISE, IDAHO 83706

STATE MUSEUM

October 13, 1981

Ms. Norma Young
Environmental Protection Agency, Region X
1200 Sixth Avenue
Seattle, WA 98101

Dear Ms. Young:

We recommend that further evaluation of the Coeur d'Alene wastewater facility site be conducted. We realize the current proposal is to expand the present wastewater facility plant. We also note that the current facility is in the "heart" of the sensitive area for archaeological materials, as defined by the previous (1980) archaeological research in the area. Therefore, we recommend that an additional inspection of the proposed construction site be made to determine whether intact archaeological deposits occur. To do this, it may be necessary to place small (1 X 1 meter) test pits in the soil in order to determine the subsurface nature of the area. If there is evidence that this land has been substantially altered or if it can be demonstrated that no archaeological deposits occur at this locality without digging test pits, then they obviously won't be necessary.

If you have any questions concerning these recommendations, please contact me.

Sincerely,

Thomas J. Green

Thomas J. Green
State Archaeologist
State Historic Preservation Office

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U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION X
1200 SIXTH AVENUE
SEATTLE, WASHINGTON 98101

REPLY TO ATTN OF: M/S 443

7 DEC 1981

Mr. Thomas J. Green
State Historic Preservation Officer
Idaho State Historical Society
610 N. Julia Davis Drive
Boise, Idaho 83706

Dear Mr. Green:

As requested in your letter of October 13, 1981, the further evaluation of the proposed construction site of the upgrade of the Coeur d'Alene wastewater treatment plant has been completed by Dr. Roderick Sprague, Director of the University of Idaho Laboratory of Anthropology.

Enclosed are copies of his clearance letter and a City of Coeur d'Alene cover letter. Dr. Sprague has confirmed that there are no undisturbed cultural remains at the site. Will you please send me your final clearance on the proposed site as soon as possible? We need to include the clearance in our Final Environmental Impact Statement. We hope to get the FEIS to the printer by the end of the year.

Sincerely,

Norma A. Young
EIS Project Officer

Attachments

cc: Dick Bain - Brown & Caldwell
Mike Rushton - Jones & Stokes

City of Coeur d'Alene

CITY HALL 8TH & MULLAN

Coeur d'Alene, Idaho 83814

Department of Public Works

December 4, 1981

Mrs. Norma Young
EPA
1200 Sixth Avenue
Seattle, WA. 98101

Subject: Archaeological Survey - Coeur d'Alene Facilities Plan

Dear Norma,

Attached is a letter from the University of Idaho confirming that there are no significant cultural remains within the fenced area north of the existing treatment facility.

The fenced area referred to by Mr. Sprague includes all the property presently owned by the City of Coeur d'Alene and, according to the Brown & Caldwell proposal, is adequate for the full six million gallon per day expansion.

I assume that this letter will suffice as the archaeological review for all phases of the treatment plant expansion presently proposed under the 291 Facility Plan.

Sincerely,

Tom Wells

Tom Wells
Director of Public Works
TW:ho:Attachment
cc: Dick Bain - Brown & Caldwell
Roger Tinkey - Dept. of Health & Welfare, CDA
Warren McFall - US EPA
Gene McAdams - City Administrator

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University of Idaho
Laboratory of Anthropology
Moscow, Idaho 83843

1 December 1981

Dick Stauffer
City of Coeur d'Alene
City Hall
8th and Mullan
Coeur d'Alene, ID 83814

Dear Mr. Stauffer:

A supplemental archaeological survey was conducted on the additional area to be included in the modified treatment facility for the city of Coeur d'Alene. Our findings are that the fenced area north of the existing facility is a fill area and contains no significant cultural remains.

I again apologize for the delay in response.

Sincerely yours,

Roderick Sprague
Director

RS:cll

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STATE MUSEUM

December 14, 1981

Ms. Norma Young
EIS Project Officer
Environmental Protection
Agency, Region X
1200 Sixth Avenue
Seattle, WA 98101

Dear Ms. Young,

Thank you for sending a copy of Dr. Roderick Sprague's report on the archaeological significance of the construction site for the improvements to the Coeur d'Alene wastewater treatment plant. Based on Dr. Sprague's report the improvements to the treatment facility will have no effect on significant archaeological or historic properties.

Sincerely,

Thomas J. Green

Thomas J. Green
State Archaeologist
State Historic Preservation Office

TJG/kmh

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